

State of Kansas

Bill Graves



Governor

Department of Health and Environment

James J. O'Connell, Secretary

RCRA



551075

January 13, 1997

Gary Burns, Facility Manager
Laidlaw d.b.a. Hydrocarbon Recyclers, Inc. of Wichita
2549 North New York
Wichita, Kansas 67219

Re: Hazardous Waste Compliance Inspection
EPA Identification Number: KSD007246846

Dear Mr. Burns:

Thank you for your letter dated September 10, 1996. Based on the information provided, violations 9 to 12 and 16 and additional comments *a*, *c* to *h* have been corrected. Violation 6 regarding container condition has not been adequately resolved and due to information provided, the citation of violation 15 has been amended.

6. This matter is currently under review by the Topeka office. I do not have copies of the regulations you cited (40 CFR 26 8.1086). You will be notified by mail of the departments decision.

15. Originally cited as failure to provide page 2 of 2 for manifest 04086.

Failure to identify the correct page numbering sequence and failure to use a unique five digit manifest number.

You stated that the state of Louisiana does not allow the use of a manifest continuation page. The manifest in question is identified with the manifest document number 04086 and as page 1 of 2. The second manifest you provided is identified with the manifest document number of 04086 with the page number showing page 1 of 1.

If a state does not allow the use of a continuation page, the page number of each manifest should be identified as page 1 of 1 and a unique manifest document number assigned to each manifest.

- b. After reviewing the container inventory report dated 4/16/96, it was found that the waste batteries stored since November 2, 1992 are not listed on the inventory provided on the day of the inspection.

The storage of these batteries is an ongoing problem which needs to be resolved. Laidlaw/HRI needs to move forward to dispose of these batteries. HRI accepted this waste in 1992 and failed to reject this shipment as nonconforming waste at that time. Laidlaw/HRI needs to outline the steps that will be initiated to dispose of these batteries and/or to pursue this case with the Sacramento Army Depot.

In addition to the batteries, the following drums were found to be stored for greater than one year:

<u>AREA</u>	<u>CONTAINER ID</u>	<u>RECEIVED</u>	<u>TREATMENT</u>
C1/C201	940000847D-001	08/18/94	LP INC
C5/C501	950090008C-001	01/10/95	SOLID INC
J1/J109	950000287P-001	03/16/95	LP INC
J2/J201	940001175Q-001	11/17/94	LP INC
J2/J201	940001211C-005	11/28/94	LP INC
J2/J201	940001282J-001	12/16/94	LP INC
J2/J201	950000115D-001	02/10/95	LP INC

I understand some of these containers were identified waste collected from household hazardous waste facilities, however; Laidlaw/HRI needs to address why it is necessary to store this waste for greater than one year.

These violations must be corrected by February 14, 1997. Please submit a response in writing addressing each violation and the action taken to correct each one.

Your cooperation with the hazardous waste management program is appreciated. If you have any questions, you may contact me at 316/337-6039.

Sincerely,



Teresa Hansen, CHMM
Waste Management Programs
Bureau of District Operations

cc: John Mitchell, BWM, Topeka
Ron Smith, BWM, Topeka
File - SCD, Wichita

SEP 11 1996

South Central District

September 10, 1996

Teresa Hansen
Kansas Department of Health and Environment
Bureau of District Operations, South Central District
Waste Management Programs
130 S. Market, 6th Floor
Wichita, KS. 67203-3802

Dear Ms. Hansen

On April 18, 1996 the KDHE Wichita Bureau of District Operations conducted a facility inspection at the Hydrocarbon Recyclers, Inc. facility (EPA ID No. KSD007246846) in Wichita (HRIW). A notice of non-compliance was issued alleging fourteen (14) violations of the Kansas Hazardous Waste Management Regulations. Our response dated May 23 addressed these issues.

On August 5, 1996 you requested additional information on alleged violations numbered 6 and 9 to 12, and adding allegations of violations numbered 15 and 16. You also requested that HRIW address 8 new "issues", identified with the letters "a" through "h". This letter provides HRIW's response, in accordance with the provisions of the notice of August 5. Responses are prepared in the order presented in the notice.

6. Permit III.C. Eighteen containers were in poor condition.

Response: The drums indicated during the inspection were stable and their integrity was not compromised, i.e., they will hold their contents and will support their own weight in those cases where they are stacked. Facility policy requires that leaking drums be emptied, repaired, or packed in a secure salvage drum immediately, and that drums whose integrity is in jeopardy be emptied, repaired, or repacked before they are placed in storage.

HRIW requests that KDHE provide clear guidance defining drum conditions that are unacceptable.

Response to comments of August 5:

HRIW agrees with the departments policy on drums whose

page 1

integrity is in jeopardy. Without question, any drum which is leaking, bulging or missing a closure device will be overpacked immediately. Additionally we have imposed an incoming load process checklist to insure that our operators carefully examine the integrity of all containers upon receipt. (See Attached) An additional quality improvement has been initiated as well. Our compliance manager is now responsible for performing the daily inspections each week day. This creates more uniformity in the assessment of our containers and consequently a higher level of quality is anticipated.

Our interpretation of what would be considered a defective or jeopardized container differs somewhat from your comments. Most of the waste which is stored in our warehouses requires a Department of Transportation (DOT) packing group II or III container, and the DOT container standards are the most specific standard established by the EPA for containers in storage in a RCRA facility [40 CFR 268.1086(b)(ii)]. To qualify a steel drum as packing group II, the DOT requires that the container survive a drop test from a height of 3.9 feet without leaking. This test may cause heavy denting or creasing of the drum, but an approved packing group II drum will nevertheless not leak as a result of the drop and superficial damage. No drum cited in your report has the type of damage that would be sustained by a full drum dropped from nearly four feet. Scrapes, dents, and creases to steel drums are incidental to transportation and handling. The drums that you present in your photographic exhibit show this type of damage. From our experience and knowledge of DOT performance oriented packaging tests, these drums are not likely to leak nor is their structural integrity likely to fail.

Meeting the department's conservative interpretation of what should be overpacked would create an undue financial burden on our facility. Our policies, procedures and training to identify drums which will be a problem has been refined. This coupled with our built-in secondary containment system and regular facility inspections has minimized the potential for uncontrolled spills. As validation of our practices, HRIW has not had a single reportable quantity spill as a result of a leaking drum at or in transit from our facility in the past two years.

9. KAR 28-31-4(g)/40 CFR 262.34(a)(3) Nineteen containers were not labelled [with EPA Hazardous Waste markings or "Non Regulated" Markings].

Response: The regulations cited refer to requirements for satellite accumulation drums. Except the two being filled with samples as noted above, none of the containers cited during the inspection were satellite accumulation drums.

Drums which were identified during the inspection were either remarked and shipped offsite, remarked in storage, or emptied. Operations personnel were retrained in the requirement that Hazardous Waste containers have appropriate EPA markings, and in the facility standard that all containers be marked to indicate their contents.

Response to comments of August 5:

Of the 19 drums listed in the attachment to your letter of August 5, 11 were acknowledged as not regulated waste, and 3 were listed as being from HHW, i.e. Household Hazardous Waste collections, and so excluded from Hazardous Waste regulations per 40 CFR 261.4(b). The remaining 5 drums were not generated at this facility and were being stored under the provisions of KAR 28-31-8(b) (for the purpose of this issue) and 40 CFR 264 Subpart I.

Training on marking and labelling requirements for containers was performed on April 17 and July 10, 1996. (See attachments)

10. Permit II.E Three daily inspections were not documented.

Response: The dates of the alleged undocumented inspections were not cited. One inspector had failed to record the date of the inspection on some pages of the inspection logs (for inspections on March 6 and March 20, 1996). These records were completed, and the inspectors were retrained.

Response to comments of August 5:

Daily inspections for April 5, 1996, January 16, 1996, and November 27, 1995 were not documented. Inspections were performed in the course of weekday operations on these days,

and those issues which occurred were addressed at that time. Documentation to this effect will be inserted in the inspection record. (See attachments)

See item "h" below for responses to additional comments.

11. Permit II.E

Remedial action was not noted on one inspection - a work order was not issued.

Response:

The date or issue of the alleged undocumented remedial action was not cited. Some issues may not be addressed before the next daily inspection. When an issue appears on more than one inspection log, additional work orders may not be issued. Inspectors have been retrained, and a tracking mechanism established, to inform inspectors of continuing issues. Remedial actions will be recorded for each issue with the first work order written for that issue, as indicated in the Permit Application.

Response to comments of August 5:

The issue cited, that a facility door was left unlocked and unattended, is an matter of incidental employee performance which can only be addressed through training. This training was given as part of the introductory RCRA training, and the annual RCRA refresher. The inspector who cited the issue locked the door at the time of the inspection, so no work order was required, but failed to note the correction on the log. Facility inspectors were retrained on May 1, 1996. (See attachment)

12. Permit II.F

(RCRA Refresher) Personnel training has not been conducted within the past year (12 months).

Response:

RCRA refresher training was conducted (as required) for all available employees during the week of April 22 - 26. All remaining employees presently requiring this annual training will receive it during the week of June 10, 1996. The facility has established a training tracking system which will prompt when recurrent or additional training is required.

Response to August 5 comments:

See attached training records.

New issues cited on August 5.

15. K.A.R. 28-31-4(d) Page 2 of 2 for manifest 04086 shipped August 31, 1995 was not provided as required. Please provide a copy of the complete manifest.

Response: See attached manifest 04086. Note that Louisiana does not allow the use of a continuation page, and that the second page of this manifest is therefore written on a 'page 1' form.

16. no citation The land Disposal Restriction notice was not provided for manifest 3730306 (the five digit manifest number was illegible. Please provide a copy of the LDR.

Response: See attached LDR notification.

Additional issues identified on August 5

- a. no citation The yellow hazardous waste sticker on drum 960216-GBCUN-127 identified the waste as D019 D022 and F022. HRI is prohibited from accepting F022 waste. Acknowledging that the F022 waste codes should have been F002, mistakes like this should be caught prior to storing the waste. How will you prevent this from happening again?

Response: Proper identification of Hazardous Material for shipment is the responsibility of the generator/shipper. Responsibility for labelling and marking in storage under RCRA TSDF rules is limited to maintaining the words "Hazardous Waste" on the container [40 CFR 264 subpart I, KAR 28-31-8(b) and 28-31-4(g)(3)]. The requirement that waste numbers be written on containers applies when the waste is prepared for shipment [40 CFR 262.32 and 49 CFR 172.203]. HRIW did not incorrectly accept or store this material.

The incoming load process checklist includes a check of drum labelling against the manifest description.

- b. no citation Four containers were found to be stored for greater than

one year. Why has this waste been stored for greater than one year? What attempts have been taken to dispose of this waste? Do you have any documentation of these attempts?

Response: None of the containers cited were specifically identified. Only one container presently on site has been in storage over one year. this container was received on November 2, 1992 as

"R.Q." Waste Poisonous Solid, Corrosive, N.O.S., 6.1, UN 2928, PGIII (Cadmium, Mercury)' with the Waste Numbers D006, D009

Our efforts to find appropriate management for these waste batteries have ascertained the following.

- No United States permitted mercury recycler capable of treating these batteries is permitted to handle D006 waste.
- The manufacturer, Rayovac, identifies the Cadmium content as less than 0.0005 % and the batteries as having no hazardous waste characteristics per 40 CFR 261.24.
- The manufacturer further identifies this battery by model number (#918) as a zinc carbon battery, with no mercury, cadmium, or lead in its formulation.
- The generator, Sacramento Army Depot, has refused to correct the characterization of this waste, or to allow for correct management of the actual material received, or to accept the material's return as non conforming material.

As a result, HRIW will petition the KDHE to waive the one year storage limit for this waste, and to allow continued storage on our site until this material can be correctly disposed.

c. no citation

Three containers were labeled "Hazardous Waste" and "Non-Hazardous Waste." Again, mistakes like this should be found when the drum is received from off-site or during the daily inspections. What steps will be taken to prevent this from happening?

Response: As cited above the incoming load process checklist includes a check of drum labelling against the manifest description, and will be an occasion for correcting self-contradictory labelling and markings. Drum labelling and marking is an issue on weekly rather than daily inspections of containers in storage, as indicated in your comments.

d. no citation

Manifests 37030306, 3730305, 37030307, 3703018, and 04270 are illegible. This waste was shipped to Cyanokem, Inc. in Detroit, MI. You said that the state of Michigan requires that they receive the original manifest for waste received by Cyanokem. What steps will be taken to assure that you receive a legible copy?

Response:

Cyanokem now provides a clear photocopy of the completed manifest for our file with our designated carbon copy.

e. no citation

OK

The final signed copy of manifest 04333 was not provided. This was for a shipment of Non-RCRA regulated waste. A final signed copy should be provided to assure that the waste was received at the final TSDF. Can you provide the final signed copy of this Manifest?

Response:

The material shipped on this manifest is not regulated by RCRA, KDHE or DOT. Its disposition and handling is not subject to Kansas regulatory authority. Copies of the appropriate shipping papers are available to the generator. (See Attached copy)

f. no citation

OK

The transporter copy for incoming manifest 00128 (NED072902513) was the only copy on file. (the transporter copy did include the final signature by HRI). the LDR was not attached to the manifest. Where is the copy of the TSDF manifest and a copy of the LDR?

Response:

No discrimination is made in the regulations between the different copies of the manifest so long as the generator, transporters, and designated TSDF retain and pass on correctly signed copies [40 CFR 262.23, 262.40, 263.20, 263.22, 264.71, etc.] A properly signed copy of the manifest with LDR Notification attached is on file at this facility. (See attached copy)

g. no citation

OK

Several drums in storage were labeled "Hazardous Waste;" however, the DOT shipping name on the label was listed as "Non-Regulated Waste" or in the waste code section "None" was written. If the contents of these drums are non-RCRA regulated waste, the yellow hazardous waste label would not be required. It is the generator's responsibility to determine if a waste is hazardous waste or

a non-regulated waste; however, the drums should be labeled with the appropriate label.

Response:

These materials are regulated by the state of California as 'Hazardous Wastes', but do not meet the definition of either EPA Hazardous Wastes or DOT Hazardous Materials, and are therefore not subject to Kansas regulatory authority.

EPA has no prohibitions on the use by states of the term 'Hazardous Waste', and several states, including California, require its use for state regulated materials. DOT does not control the use of the term 'Hazardous Waste', but does restrict the use of Proper Shipping Names and Hazard Classes for Hazardous Materials and EPA regulated wastes under its rules. The materials are correctly described under DOT and California rules, and no contradiction of Kansas regulations or violation of the storage requirements of our permit is cited. HRIW will mark and label these materials appropriately when preparing the materials for shipment.

h. no citation

OK


The daily inspection logs are nine pages long. The completed inspections are stored in a three ring binder. There is a space on each page for the inspector's name, date and time of the inspection; however, on some inspection logs, the name of the inspector was only written on page 1. The inspector's name and the date of the inspection should be filled out for each page, or the inspection logs should be stapled together to prevent the logs from being separated.

Response:

The inspector's name and the date will be written on each page of the inspection logs.

Should you have any questions about this response please feel free to contact me or Ron Robertson of my staff at (316) 268-7500.

Sincerely;


Gary Burns
Facility Manager

xc: Tim Kent
Bill Hallam
Ashley Chadwick

DRUM RECEIVING AND OFFLOADING

Operator in charge: _____ Time: _____ Date: _____

Supervisor: _____ Shipper: _____ Manifest# _____

Additional Shippers: _____ Manifest# _____

_____ Manifest# _____

_____ Manifest# _____

ISSUE	OPERATION	CHECK OFF
Truck Safety	Engine Off	
	Wheels Chocked	
	Ramp Secured	
Manifest	Drum count matches	
Drum Integrity	Containers incompatible with content?	
	Repacks Required - number	
	Overpacks Required - number	
	Loose bungs/lids/gaskets	
Labelling	Missing EPA Markings or DOT Labels	
Incompatibles	Acids and Bases Identified and Separated?	
	Oxidizers Identified and separated from Fuels?	
	Acids and Cyanides on same load? * DOT Exemption cited on Manifest?	
	PIH Zone I? - contact operations manager	

Operator's Signature: _____

MONTHLY OPERATIONS MEETING

APRIL 17, 1996

FACILITATOR: GERRY STAFFORD

279

Ex. 6 PII

Printed Name

Signature

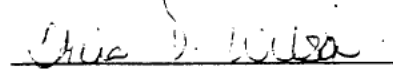
Theresa Wheeler



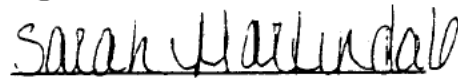
Paul Mark



Trina Wilson



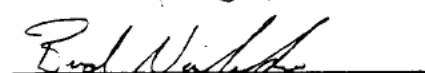
Sarah Martinck



Richard D. Shouse



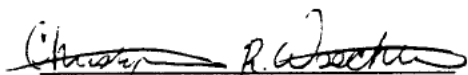
Brad Nicholson



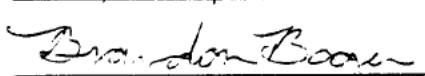
Michael Green



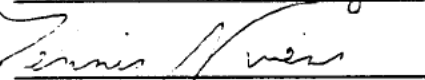
Chris Wrechter



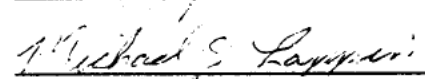
Brandon Boeger




Dennis Vives



Michael S. Lappier



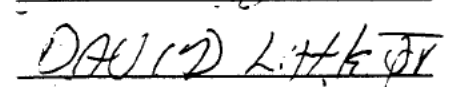
Michael Dandurand



CLAYTON R. RICH



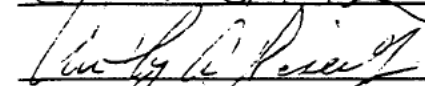
CLAYTON R. RICH

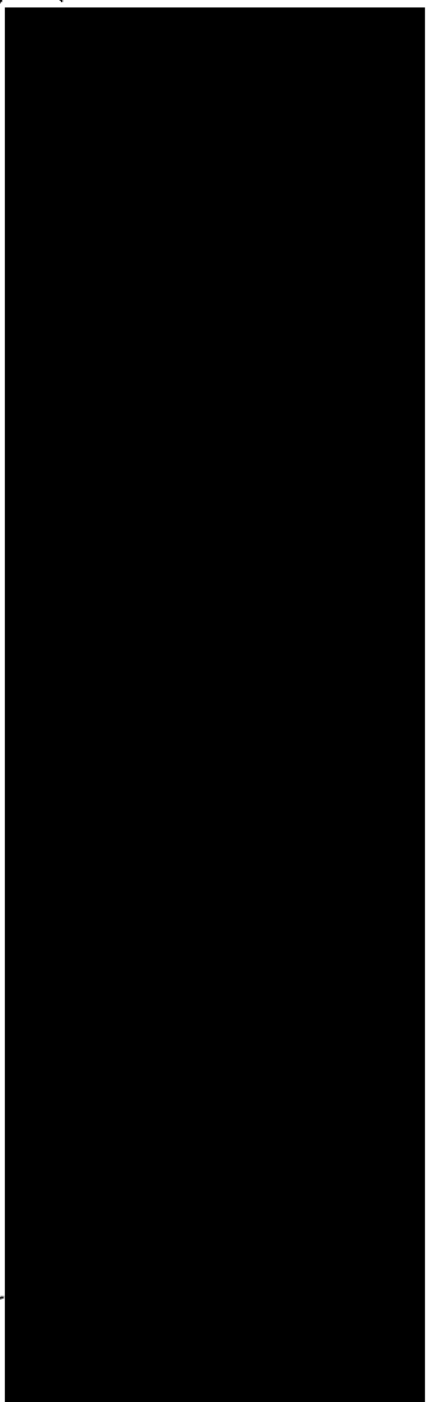


CL Smith



Arthur A. Resnick





MEMORANDUM

TO: PRODUCTION PERSONNEL

FROM: THERESA

DATE: APRIL 17, 1996

RE: MONTHLY OPERATIONS MEETING

- * Reviewed last months meeting:
 - Mercaptan drum incident
 - Drums over 270 days
 - CS training
 - Lab sample turn-around time
 - Proper use of PPE
 - Clive solid bulking program/profiles
 - Tank tracking in WMS
- * Gerry discussed the ongoing KDHE inspection and what they are noting:
 - Drum conditions
 - Drum markings and labels
 - Lab acid collection drum (corrected)
 - Position of drums on pallets
 - Floor coating in B-building: Mike says that the 2nd weekend in May is when floor coating repair will happen

KDHE will continue their inspection today going over I and J buildings, and paperwork.
- * Chris discussed drums over 270 days old:
 - The majority of drums are the keto-enol drums
 - Some unknown organic peroxide drums to be fingerprinted and sent to Ensco
 - AERC drums...will get a list to Theresa
 - Cylinders to drop codes off
 - A total of 230 containers over 270 days; only a little over 500 left in FIMS
- * Gerry talked about the Safety Committee Meetings being restarted. They are OSHA and Laidlaw required. Brad is the Chairman, Scott is Vice-chair and Richard is Secretary.
- * Theresa discussed SOP for the identification and segregation of incompatible materials (see attached SOP-9601).
 - Paul conducted a demonstration of incompatible materials.
- * Mike discussed RCRA and DOT empty containers. (49CFR 173.29, see attached)
 - Must have all labels removed and be empty to be both DOT and RCRA empty
- * Theresa discussed waste streams that do not require a sample, and ones that require a visual inspection (see attached), and incoming bulk load procedures (see attached)

MEMORANDUM

To: Production Personnel Lab Personnel
From: Gerry Stafford *Gerry*
Date: April 17, 1996
Re: OPERATIONS MEETING - APRIL 17, 1996

REVIEW MARCH OPS. MEETING GERRY

OPERATIONAL ISSUES:

- ISSUES FROM THE KDHE INSPECTION GERRY
- CONTAINERS OVER 270 DAYS CHRIS W.

HEALTH AND SAFETY:

- SAFETY COMMITTEE MEETINGS GERRY

TRAINING EXERCISES:

- IDENTIFICATION AND SEGREGATION OF INCOMPATIBLE MATERIALS (AIR REACTIVES, ACIDS. AND CAUSTICS) (SOP-9601) PAUL
- DOT AND RCRA DEFINITIONS OF EMPTY DRUMS MIKE G.
- WASTE STREAMS THAT DO NOT REQUIRE A SAMPLE THERESA

STANDARD OPERATING PROCEDURE

TITLE: IDENTIFICATION AND SEGREGATION OF INCOMPATIBLE MATERIALS

FACILITY: *Wichita*

H & S S.O.P. #

SOP-9601

PAGE 1 OF 3

<u>PREPARED BY</u> Ron Robertson	<u>APPROVED BY (Signature)</u> <u>TITLE</u> Operations Manager	<u>DATE</u>	EFFECTIVE DATE:
Theresa Wheeler	Project/Job Supervisor		REVIEW DATE:
Mike Green	Health & Safety		SUPERSEDES:
NOTE: THIS S.O.P. SHALL NOT BE REVISED, REPLACED, OR MODIFIED WITHOUT APPROVAL OF THE OPERATIONS MANAGER AND THE RESPECTIVE HEALTH AND SAFETY REPRESENTATIVE.			

PURPOSE: The purpose of this SOP is to safely and efficiently identify the characteristics of hazardous materials which will be stored at the facility, and ensure that incompatible materials are segregated in storage.

RESPONSIBILITY:

- Supervision: will ensure that all personnel involved are trained and that all procedures are followed in a manner that keeps safety as the first priority. Supervisors will maintain a safety watch on the activity. Supervisors will ensure that all materials generated are properly characterized, marked, and managed according to facility policy.
- Laboratory: will have responsibility for ensuring that materials with special hazards, such as acids, bases, and air reactive materials, are identified and that this information is communicated to Operations.
- Customer Service: will have responsibility for ensuring that profile and manifest information provides complete and accurate information about the hazardous characteristics of the material.
- Samplers: have responsibility for checking the received material against the shipping description, and for properly marking acids, bases, and air reactives.
- Operators: one or more operations personnel will be required to perform these tasks. Workers will read and review this procedure. Workers will follow SOP and safe operating procedures including proper use of PPE, proper material storage and handling techniques, spark/ignition source controls, and proper tracking of waste handling and movements. Workers are responsible for reporting unsafe conditions or work practices to their supervisor and Health and Safety.

The basis for identification of incompatible materials will be the DOT hazard class of the material, with the addition of the following information, if applicable:

- for Class 8 materials, whether the material is acidic or basic
- for Class 4 materials, the identification of any air reactive material.

Waste Management (Containers and Tanks)
EMPLOYEE HANDOUT
WCM-WCH-496

Task 5: Handle used/empty drums.

- a. Define "empty" according to DOT.
- b. Define "empty" according to EPA.
- c. Compare and contrast DOT and EPA empty.
- d. Given a picture or description of a container, determine if it is DOT empty, EPA empty, or neither.
- e. Describe the marking requirements for both a DOT and EPA empty drum.
- f. Describe shipping paper requirements for empty drums (both EPA and DOT).

If a facility does any sort of bulking, consolidation, or repackaging operations, it is likely that a large number of empty drums will be generated. It is important to handle these empties properly, since DOT and EPA have different definitions and requirements for empty containers.

DOT Empty

In 49 CFR 173.29, DOT states that a container is considered empty for transportation purposes when all markings have been removed or obliterated and when the *package has been sufficiently cleaned of residue and purged of vapors so as to remove any potential hazard*, or if it has been refilled with another material that causes the hazard to be removed.

DOT empty means clean. There should be nothing dangerous remaining in the container. If it is not DOT empty, DOT labels and markings should remain on the container.

RCRA empty

Most residues of Hazardous Waste in empty containers are not considered Hazardous Waste as long as certain requirements are met:

1. All wastes have been removed using common practices for that material--i.e the materials have been pumped, poured, or scraped out

AND

- a. No more than 1 inch of waste remains on the bottom of the container

OR

- b. No more than 3 % by weight remains in the container if it is non-bulk or .3 % by weight if it is bulk.

OR

- c. If it is a compressed gas, the pressure in the container approaches atmospheric.

OR

- d. If it held P-listed wastes, the container has been triple-rinsed.

The above regulations show that a container may not be a Hazardous Waste (it is RCRA-empty) but it may be a Hazardous Material (there may be a potential hazard from residue or vapor so it is not DOT-empty). Be extremely careful when transporting one of these "empty" containers-- know the definitions.

Exercise:

- a. 50 55-gallon drums of D008 lead contaminated wastewaters (no solid present) were pumped into a tank. None of the drums contain any liquid. They look clean.

DOT empty??

RCRA empty??

If no to either, what needs to be done to make the container meet the definition?

- b. A tanker containing Class 8 corrosive Hydrochloric acid was unloaded at a facility. The material, without the equipment, originally weighed 48,000 lb. After unloading, there is 2000 lb of material left on the bottom.

11/16/16.

NOT empty.

DOT empty??

RCRA empty??

If no to either, what needs to be done to make the container meet the definition?

- c. Drums containing paint were poured into a tank. Sludge was scraped out. The drums are generally empty, but have less than an inch of residue on the bottom.

DOT empty??

RCRA empty??

If no to either, what needs to be done to make the container meet the definition?

- d. Dieldrin was used as a pesticide from a 5-gallon drum. There does not seem to be any residue.

DOT empty??

RCRA empty??

If no to either, what needs to be done to make the container meet the definition?

Marking empty drums

Drums that meet the definition of RCRA-empty are no longer Hazardous Wastes. Any markings that identified them as Hazardous Waste need to be removed. However, if they are not DOT-empty, they need to have the Hazard labels and markings as if they had a greater quantity of that material.

If a drum is DOT-empty, all labels and markings need to be removed, obliterated, or covered. An empty label may be used.

Shipping papers

If a container is RCRA-empty, it is no longer a Hazardous Waste and need not be described on a manifest. However, if it is not DOT empty, it needs to be described as "Residue: Last contained" and the shipping description of the material it last contained. However, if that container is being transported via private or contract carrier for recycling or reclamation, it does

July 10, 1996

RECEIVED

SEP 11 1996

Operations Meeting Agenda

Training Issues: The importance of compliance

South Central District

Leaking Drums

- What we mean by 'leaking'
- What we mean by 'immediate response'

Staging

- As defined by The Permit
- What is a 'shift'
- Bad weather

Markings and Labels Required on Drums and Packages

- For shipping to and receiving at this facility
- For storage at this facility
 - = "Arrived, Received, Accepted"
 - = 10-Day Transfers
- For shipment from this facility
- For Site Generated Waste
 - = In Accumulation Drums
 - = When full

Satellite Accumulation of Site Generated Waste

- Procedure and SOP

Compatibility

- SOP
- Incompatible materials per the DOT Segregation Chart and beyond
- Chemical groups, Proper Shipping Names, and clues
- Identifying materials which may be hazards in storage
during unloading and sampling
- Secondary containment areas (Container Management Units)
- Exercise

Table D.2
CMU Containment Summary

Container Management Unit (CMU)	Maximum Number of Drums Stored (55 gallon drum equivalents)		Gallons - Containment Capacity Required for Containers (10 % Container Capacity)	Gallons - Containment Provided
	Drums	Gallons		
D100/D200	784	43,120	4,312	13,480
D300	64	3,520	352	3,606
P100/P200	180	9,900	990	32,583
C100	16	880	88	244
C200	16	880	88	192
C300	240	13,200	1,320	3,842
C400	184	10,120	1,012	3,195
C500	192	10,560	1,056	3,233
C600	192	10,560	1,056	3,233
C700	962	52,910	5,291	16,690
L100	272	14,960	1,496	1,835
B100	120	6,600	660	2,262
B200	384	21,120	2,112	5,592
B300	360	19,800	1,980	5,630
B400	136	7,480	748	2,582
I100	416	22,880	2,288	4,503
I200	64	3,520	352	635
I300	440	24,200	2,420	6,088
J100	448	24,640	2,464	6,787
J200	96	5,280	528	987
J300	64	3,520	352	502
J400	64	3,520	352	502
J500	64	3,520	352	502
J600	64	3,520	352	502
J700	96	5,280	528	754

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Note 1: These containment volume requirements do not include requirements for tank systems. The letter shown in the CMU identification number indicates the location by building (D - Building D, P - Processing Area, C - Building C, L - Drum Dock, B - Building B, I - Building I, and J - Building J).

Note 2: The largest container in Area I100 would be a 5,000 gallon tanker. The containment provided (5,399 gallons) is sufficient to hold the volume of this container.

**Table D.1
Container Storage Building Capacities**

Container Storage Building	Materials Managed	Permitted Storage Capacity (Gallons)	Storage Capacity (55 Gallon Drum Equivalents)
Building D	Ignitable and/or non-ignitable or combination of both	46,640	848
Processing Area	Liquid and solid hazardous and/or non-hazardous materials	9,900	180
Building C	Ignitable and non-ignitable hazardous and non-hazardous materials	99,110	1,802
Drum Dock	Containerized materials	14,960	272
Building B	Corrosives and other non-ignitable hazardous and non-hazardous materials	55,000	1,000
Building I	Hazardous and non-hazardous materials	50,600	920
Building J	Hazardous and non-hazardous materials	49,280	896
Total Capacity		325,490	5,918

Note: Total capacity (gallons) is the additive container storage capacity for all storage buildings. Note that additional storage of waste in tanks occurs in some of these areas; permitted waste tank storage capacity is not reflected in this summary.

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D-3 General Container Management Practices:

When moving containers between storage areas, loading areas, and/or process areas, the facility may need to temporarily stage containers prior to transfer to the next unit. This staging will generally occur in the unloading areas or in the area between Building C and the Processing Area. All staging will occur in paved areas. This staging of containers will not exceed one shift or eight hours.

During the unloading procedure, the containers will be visually checked. Those containers selected for sampling and analysis will be opened and sampled as described in Section C, Waste Characterization, Appendix C-A, Waste Analysis Plan (WAP). Sampling may occur on the unloading platform, in the working area, in a CMU or, prior to unloading, on the transport vehicle. Once samples have been obtained, the containers will be re-closed and will remain staged or be placed in a CMU until incoming load procedures are completed in accordance with the WAP. Containers which are not already in a containment unit will be moved into a CMU after the incoming load procedures are completed and the waste stream is accepted. If incoming load procedures cannot be completed in 72 hours, containers will be placed in an appropriate CMU, based on manifest, pre-acceptance, and other information available about the waste. If subsequent analytical or other information identifies a compatibility problem, the container will be moved to an appropriate CMU, rejected and returned to the generator, or transferred to another facility capable of handling the material.

Hazardous and non-hazardous wastes may be stored within the same CMU, but they will not be stored on the same pallet, except insofar as they have been received on the same pallet (e.g., lab packs, wrapped pallets, etc.). The Waste Tracking System will provide a record of the location of all wastes at the facility. This report will be available for facility personnel and inspectors to identify the location of both hazardous and non-hazardous wastes at the facility.

For purposes of meeting the requirements of 40 CFR 268.50, containers are dated during the incoming load or off-loading procedures.

At times, 55 gallon or larger containers may be stacked two (2) high (double-stacked), providing that the wastes are compatible and that such stacking is consistent with the National Fire Protection Association (NFPA) code for flammable storage.

Inspection aisles of two (2) feet or more in width will be maintained between adjacent double rows of 55-gallon or larger containers in CMUs.

The bottom layer of containers in storage are placed on pallets or skids, or are otherwise managed to prevent contact of containers with any accumulated liquids. Rows will be no more than two (2) 55-gallon or larger containers wide. Dividers such as wooden pallets or plywood sheeting may be placed on top of the bottom row(s) of drums. A second layer of containers may be placed on top of the bottom row.

D-3b(2) Containers - Smaller Than 55 Gallon:

Smaller containers, particularly those small volume containers such as pint, quart, gallon, and five (5) gallon sizes, may be stored in stacks more than two (2) high, and will frequently be received that way. Any stacking of containers not specifically regulated by the NFPA code will be performed with safety of personnel uppermost in mind. Stacking of containers of less than fifty-five (55) gallon capacity will be restricted to a height not to exceed six (6) feet to facilitate inspection. This does not preclude, as an accepted management practice, the placing of large numbers of small containers within drums or larger overpack containers, and the double stacking of these larger containers, nor the storage of individual containers which may exceed a height of six (6) feet, nor the stacking of palletized small containers. The total volume of containers of wastes with free liquids will not be allowed to exceed that allowed by the secondary containment capacity.

Where applicable, inspection aisles of two (2) feet or more in width will be maintained in CMUs between adjacent rows of pallets of containers that hold less than 55 gallons.

The Waste Tracking System will provide a record of the location of each container of waste received at the facility, including those containers that are arranged or stacked in such a way that not all labels may be visible from the aisle. The Waste Tracking System will be updated at least once each day that containers of waste are moved.

D-3c Waste and Container Compatibility: 40 CFR 264.172

Wastes accepted for storage, treatment, or other management are required to be compatible with the containers used to store them. USDOT and Performance Oriented Packaging Standards will dictate the shipment in, and use of, alternate containers meeting regulated performance requirements. HRIW may receive waste in any appropriate USDOT approved or performance

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specified container for management at the facility. Site-generated waste may be accumulated in specially designed containers specific to the plant process equipment.

D-3d Condition of Containers: 40 CFR 264.171

Facility personnel will inspect all containers for evidence of leakage, deterioration, or severe corrosion as part of the incoming load and unloading procedures at HRIW. Containers are also routinely inspected while in storage. Inspection schedules are discussed in Section F, Inspection Plan. Containers exhibiting evidence of leakage, deterioration which would affect the structural integrity of the container, or severe corrosion will be transferred into overpacks, or containers in good condition, or the wastes may be transferred directly into tanks or treatment units. Open containers, improper storage in CMUs, and evidence of spills and leaks are among the focal points of inspections. Transporters of Hazardous Waste are required to meet the specifications in the USDOT regulations in 49 CFR Part 178 Subparts A through J, 49 CFR 179 Subparts J through O, and the requirements of 49 CFR 172.101 with respect to design and use of containers. Changes in these and other regulations brought about by USDOT's Performance Oriented Packaging Standards will be observed, by HRIW or generators sending shipments of waste to HRIW, as they are made effective.

Any containers found to be inadequately or improperly identified or deficient in the required information may be staged in a holding area until the deficiency can be resolved.

D-3e Response to Leaks: 40 CFR 264.171

Because the secondary containment system is designed to prevent storm water run-on, liquids found on the floor of a CMU will be either blown precipitation or leaks of stored materials. When an inspection reveals liquid within a contained area, the source will be identified if possible. If liquids are discovered, they will be removed within twenty-four (24) hours of detection, or as soon as practical. The identification of the origin of the liquid may be accomplished in a number of ways, using a variety of inspection techniques. Visual inspection of the condition of containers for localized staining or leakage adjacent to a particular container is the technique most likely to be employed to trace the source of a leak. If this measure fails, a sample of the liquid in the containment area will be analyzed for a range of parameters based upon the possible contents of the containers in the affected CMU. This process should indicate the waste stream type from which the leaking waste may have originated. All containers holding that waste stream type within the CMU will then be checked for leaks until the leak is found.

Wastes from the leaking container will be managed as described in D-3d. Liquid in the containment area may be transferred to an appropriate container, or to one or more storage tank(s), using a portable pump. Other suitable methods using absorbents, vacuum systems, etc., may also be used to manage spills. Any container into which wastes are transferred will be appropriately identified as to the type of waste stored in it. Minor quantities of liquids may be absorbed, collected, and placed in an appropriately identified container.

D-3f Special Requirements for Ignitable and Reactive Wastes: 40 CFR 264.176.

Ignitable and reactive wastes will be segregated from incompatible materials within CMUs. Segregation may involve placement in separate CMUs, or use of portable secondary containment units. Containers of ignitable or reactive wastes are stored at least fifty (50) feet from the facility property boundary. CMUs that may contain ignitable or reactive wastes include C100, C200, C400, C500, C600, C700, L100, P100, P200, D100, D200, D300, D400, I200, I300, I400, J100, J200, J300, J400, J500, J600, J700, and all but the west twenty-five (25) feet of I100. Because of the requirements of 40 CFR 264.176, ignitable or reactive wastes will not be stored in CMUs C300, B100, B200, B300, B400, and the west twenty-five (25) feet of I100. Measures to prevent accidental ignition of ignitable wastes include the prohibition of smoking, use of non-sparking tools, and enforcement of procedures to control burning and welding in areas where these wastes are stored. Section F, Inspection Plan, addresses these procedures in detail.

D-3g Special Requirements for Incompatible Wastes: 40 CFR 264.177.

During unloading procedures, the containers will be visually checked. Those containers selected for sampling and analysis will be opened and sampled as described in the WAP (see Section C, Waste Characterization). Sampling may occur on the unloading platform, in the working area, in a CMU, or prior to unloading, on the transport vehicle. Once samples have been obtained, the containers will be re-closed and will remain staged in accordance with the WAP until the incoming load procedures are completed. If incoming load procedures are not completed within 72 hours, the containers will be transferred into an appropriate CMU, as determined using available information (e.g., manifest, Waste Profile Sheet, etc.). Containers which are not already in a CMU will be moved into a CMU after the incoming load procedures are completed or within 72 hours. Should a container of waste be determined to be incompatible with the other wastes stored in a CMU as a result of analysis, it will be segregated from incompatible wastes. Portable containment units may be used to facilitate segregation.

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To ensure that residues from wastes previously stored in a CMU do not contact potentially incompatible wastes about to be placed in the CMU, the following procedure will be observed. The CMU will be visually inspected when containers are removed for compatibility service change, and will be cleaned if evidence of a spill is found prior to placement of the next waste into the CMU for storage.

HRIW may transfer wastes from one container to another. In accordance with 40 CFR 264.177(b), hazardous waste will not be placed in an unwashed container that previously held an incompatible waste or material, except when that placement constitutes known and planned treatment as discussed in Section D-5, Treatment in Containers.

D-3h Transshipment of Containers of Waste:

The majority of wastes received at the HRIW facility will be stored, processed, and shipped off-site. However, some wastes, primarily waste in drums, which are intended for treatment or direct disposal at off-site facilities, may be temporarily stored at HRIW. The facility may occasionally serve as a 10-day transfer station for wastes destined for incineration, disposal, or other management at another facility. This 10-day transfer will comply with the requirements of 40 CFR 263.12 and 264.1(g)(9). 10-day transfer stations are not subject to the permit requirements of 40 CFR 270 (see 40 CFR 270.1(c)(2)(vi)).

10-day transfer wastes may remain at the site for a period not to exceed ten (10) days prior to continuing the journey to the designated treatment, storage, or disposal site. 10-day transfer loads remain "in transit" during the entire stay at the site. These wastes may be off-loaded and transferred to another vehicle or to a railcar. Because these 10-day transfer loads are never accepted into the HRIW waste management system, no analyses are performed on the loads. They will, however, be identified in the Waste Tracking System.

TITLE: **IDENTIFICATION AND SEGREGATION OF INCOMPATIBLE MATERIALS**FACILITY: *Wichita*H & S S.O.P. # **SOP-9601**

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<u>PREPARED BY</u> Ron Robertson	<u>APPROVED BY (Signature)</u>	<u>TITLE</u> Operations Manager	<u>DATE</u>	EFFECTIVE DATE:
Theresa Wheeler		Project/Job Supervisor		REVIEW DATE:
Mike Green		Health & Safety		SUPERSEDES:
NOTE: THIS S.O.P. SHALL NOT BE REVISED, REPLACED, OR MODIFIED WITHOUT APPROVAL OF THE OPERATIONS MANAGER AND THE RESPECTIVE HEALTH AND SAFETY REPRESENTATIVE.				

PURPOSE: The purpose of this SOP is to safely and efficiently identify the characteristics of hazardous materials which will be stored at the facility, and ensure that incompatible materials are segregated in storage.

RESPONSIBILITY:

- Supervision: will ensure that all personnel involved are trained and that all procedures are followed in a manner that keeps safety as the first priority. Supervisors will maintain a safety watch on the activity. Supervisors will ensure that all materials generated are properly characterized, marked, and managed according to facility policy.
- Laboratory: will have responsibility for ensuring that materials with special hazards, such as acids, bases, and air reactive materials, are identified and that this information is communicated to Operations.
- Customer Service: will have responsibility for ensuring that profile and manifest information provides complete and accurate information about the hazardous characteristics of the material.
- Samplers: have responsibility for checking the received material against the shipping description, and for properly marking acids, bases, and air reactives.
- Operators: one or more operations personnel will be required to perform these tasks. Workers will read and review this procedure. Workers will follow SOP and safe operating procedures including proper use of PPE, proper material storage and handling techniques, spark/ignition source controls, and proper tracking of waste handling and movements. Workers are responsible for reporting unsafe conditions or work practices to their supervisor and Health and Safety.

The basis for identification of incompatible materials will be the DOT hazard class of the material, with the addition of the following information, if applicable:

- for Class 8 materials, whether the material is acidic or basic

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- for Class 4 materials, the identification of any air reactive material.

The basis for segregation of materials will be the DOT Segregation Chart, 49 CFR 177.848(d). In addition, acids will be kept segregated from bases, and air reactives will be specially marked with the following information: "Air Reactive: DO NOT OPEN".

REQUIREMENTS:

- I. Equipment:
 - appropriate DOT Hazard Class Labels on all containers of waste received at or stored in the facility
 - Special instruction labels
 - Wastestream Profile
 - Incoming Manifest
 - DOT Compatibility Charts
- II. Procedure for Identifying Incompatible Materials:
 1. The Wastestream approval process includes a review of the hazardous characteristics of the material. The hazardous characteristics are recorded in the Waste Profile, which is entered into the facility WMS record for the material. Part of this record is the proposed DOT proper shipping name, and it will include the DOT Hazard Class assigned to the material. As part of the acceptance process, the Technical manager or designee will confirm the Hazard Class and ensure that hazards such as acids, bases, air reactives, and other characteristics which can affect compatibility in storage or management (for example, water reactives, poisons, and peroxides) are determined and clearly recorded.
 2. When the material is received, each waste stream is inspected and sampled for pH, specific gravity, and the presence and depth of solids. This information is checked against the manifest description of the material during sampling, and taken to the Lab where it is confirmed and checked against the profile. Any discrepancies from the hazard class as described in the manifest or the profile must be resolved and the correct DOT Labels placed on the containers.
 3. Because the DOT Labels do not reflect whether a Class 8 (corrosive) material is acid or base, or whether a Division 4.1 material is air reactive, containers of these materials will be marked with a white label carrying this information: "ACID", "BASE", or " Air Reactive: DO NOT OPEN". It is the responsibility of the sampler to identify

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these containers from the shipping description, by observation of the material and by testing, and to mark them accordingly as they are sampled. It is the responsibility of the Lab to check this information, resolve any discrepancies, and confirm that these materials have been properly marked.

III. Procedure for Segregating Incompatible Materials

1. Material will be handled according to the available information at all times, from the point it is removed from the transport vehicle. Incompatible materials will be separated from each other by secondary containment. Special attention will be given to Hazard Classes 4, 5, 6 PG1A, and 8.

2. Following are the Hazard Classes which can be stored in each Permitted Storage and Management building at the facility:

Building B: 2.2, 6.1 (but not PG1 zone A), 8, 9

Building C: All Hazard Classes

Building D: 2.2, 6.1 (but not PG1 zone A), 8, 9

Building I: All Hazard Classes

Building J: All Hazard Classes

Processing: All Hazard Classes

This facility does not manage Class 1 material (explosive), Division 2.3 (poisonous gas) or Division 6.2 (infectious). Class 6.1 PG1 Zone A poisons and other extremely dangerous or reactive materials will be handled only on a special case basis, requiring the coordination of Customer Service, Operations, Laboratory, Health & Safety, and possibly Field Services departments.

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Compatibility Exercise

After sorting the Facility CMUs into compatibility groups, place the following into appropriate storage

hydrochloric acid

nitric acid

sodium hypochlorite

sodium hydroxide

hydroquinone

sodium sulfite

freon

sodium cyanide

plating sludge, contains chrome

calcium hypochlorite

potassium cyanide

sodium nitrite

organic peroxide, class 6

batteries, wet, containing acid

batteries, dry, alkaline

silver nitrate

potassium chlorate

nitric acid, fuming, labpack

phosphoric acid

hazardous waste liquid, pH 3

monoethanol amine

ammonia

potassium hydroxide

hazardous waste, solid, alkaline

waste flammable liquid

chromic acid

waste gasoline

Trichlorotrifluoroethylene

Hydrocarbon Recyclers, Inc. of Wichita d/b/a USPCI
RCRA Permit Application
Section D
Use and Management of Containers

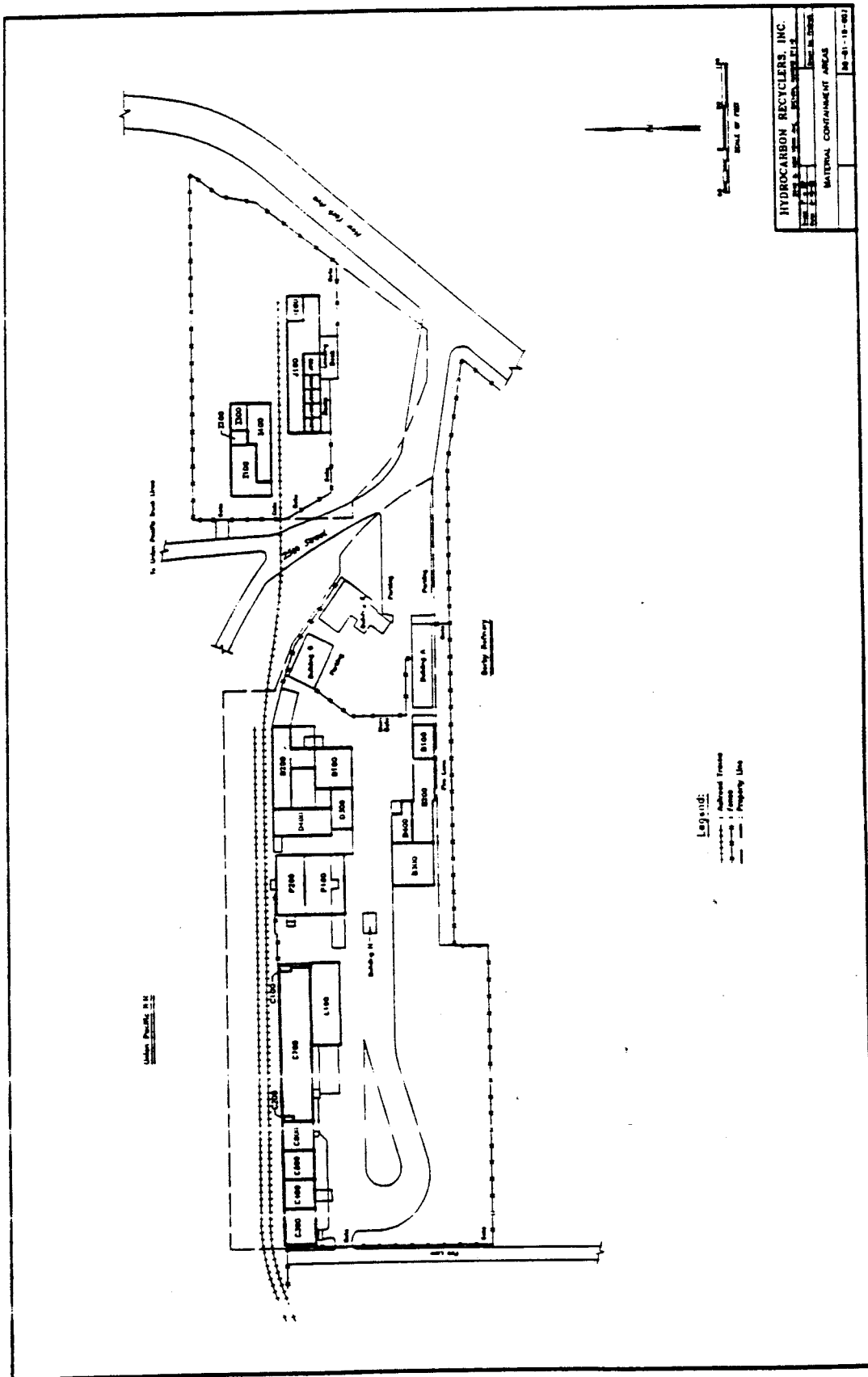


Figure D.2. Material Containment Areas

Table D.1
Container Storage Building Capacities

Container Storage Building	Materials Managed	Permitted Storage Capacity (Gallons)	Storage Capacity (55 Gallon Drum Equivalents)
Building D	Ignitable and/or non-ignitable or combination of both	46,640	848
Processing Area	Liquid and solid hazardous and/or non-hazardous materials	9,900	180
Building C	Ignitable and non-ignitable hazardous and non-hazardous materials	99,110	1,802
Drum Dock	Containerized materials	14,960	272
Building B	Corrosives and other non-ignitable hazardous and non-hazardous materials	55,000	1,000
Building I	Hazardous and non-hazardous materials	50,600	920
Building J	Hazardous and non-hazardous materials	49,280	886
Total Capacity		325,490	5,918

Note: Total capacity (gallons) is the additive container storage capacity for all storage buildings. Note that additional storage of waste in tanks occurs in some of these areas; permitted waste tank storage capacity is not reflected in this summary.

Table D.2

CMU Containment Summary

Container Management Unit (CMU)	Maximum Number of Drums Stored (55 gallon drum equivalents)		Gallons - Containment Capacity Required for Containers (10 % Container Capacity)	Gallons - Containment Provided
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B300	360	19,800	1,980	5,630
B400	136	7,480	748	2,582
I100	416	22,880	2,288	4,503
I200	64	3,520	352	635
I300	440	24,200	2,420	6,088

J100	448	24,640	2,464	6,787
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J300	64	3,520	352	502
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J500	64	3,520	352	502
J600	64	3,520	352	502
J700	96	5,280	528	754

Note 1: These containment volume requirements do not include requirements for tank systems. The letter shown in the CMU identification number indicates the location by building (D - Building D, P - Processing Area, C - Building C, L - Drum Dock, B - Building B, I - Building I, and J - Building J).

Note 2: The largest container in Area I100 would be a 5,000 gallon tanker. The containment provided (5,399 gallons) is sufficient to hold the volume of this container.

D-3 General Container Management Practices:

When moving containers between storage areas, loading areas, and/or process areas, the facility may need to temporarily stage containers prior to transfer to the next unit. This staging will generally occur in the unloading areas or in the area between Building C and the Processing Area. All staging will occur in paved areas. This staging of containers will not exceed one shift or eight hours.

Equipment is available to facilitate such operations as the transfer of wastes from a damaged container to a container in good condition, the manual repackaging of containers, the transfer of leaking containers into overpacks, and the removal of individual containers from CMUs.

During the unloading procedure, the containers will be visually checked. Those containers selected for sampling and analysis will be opened and sampled as described in Section C, Waste Characterization, Appendix C-A, Waste Analysis Plan (WAP). Sampling may occur on the unloading platform, in the working area, in a CMU or, prior to unloading, on the transport vehicle. Once samples have been obtained, the containers will be re-closed and will remain staged or be placed in a CMU until incoming load procedures are completed in accordance with the WAP. Containers which are not already in a containment unit will be moved into a CMU after the incoming load procedures are completed and the waste stream is accepted. If incoming load procedures cannot be completed in 72 hours, containers will be placed in an appropriate CMU, based on manifest, pre-acceptance, and other information available about the waste. If subsequent analytical or other information identifies a compatibility problem, the container will be moved to an appropriate CMU, rejected and returned to the generator, or transferred to another facility capable of handling the material.

Hazardous and non-hazardous wastes may be stored within the same CMU, but they will not be stored on the same pallet, except insofar as they have been received on the same pallet (e.g., lab packs, wrapped pallets, etc.). The Waste Tracking System will provide a record of the location of all wastes at the facility. This report will be available for facility personnel and inspectors to identify the location of both hazardous and non-hazardous wastes at the facility.

For purposes of meeting the requirements of 40 CFR 268.50, containers are dated during the incoming load or off-loading procedures.

At times, 55 gallon or larger containers may be stacked two (2) high (double-stacked), providing that the wastes are compatible and that such stacking is consistent with the National Fire Protection Association (NFPA) code for flammable storage.

Inspection aisles of two (2) feet or more in width will be maintained between adjacent double rows of 55-gallon or larger containers in CMUs.

The bottom layer of containers in storage are placed on pallets or skids, or are otherwise managed to prevent contact of containers with any accumulated liquids. Rows will be no more than two (2) 55-gallon or larger containers wide. Dividers such as wooden pallets or plywood sheeting may be placed on top of the bottom row(s) of drums. A second layer of containers may be placed on top of the bottom row.

D-3b(2) Containers - Smaller Than 55 Gallon:

Smaller containers, particularly those small volume containers such as pint, quart, gallon, and five (5) gallon sizes, may be stored in stacks more than two (2) high, and will frequently be received that way.

Any stacking of containers not specifically regulated by the NFPA code will be performed with safety of personnel uppermost in mind. Stacking of containers of less than fifty-five (55) gallon capacity will be restricted to a height not to exceed six (6) feet to facilitate inspection. This does not preclude, as an accepted management practice, the placing of large numbers of small containers within drums or larger overpack containers, and the double stacking of these larger containers, nor the storage of individual containers which may exceed a height of six (6) feet, nor the stacking of palletized small containers. The total volume of containers of wastes with free liquids will not be allowed to exceed that allowed by the secondary containment capacity.

Where applicable, inspection aisles of two (2) feet or more in width will be maintained in CMUs between adjacent rows of pallets of containers that hold less than 55 gallons.

The Waste Tracking System will provide a record of the location of each container of waste received at the facility, including those containers that are arranged or stacked in such a way that not all labels may be visible from the aisle. The Waste Tracking System will be updated at least once each day that containers of waste are moved.

D-3c Waste and Container Compatibility: 40 CFR 264.172

Wastes accepted for storage, treatment, or other management are required to be compatible with the containers used to store them. Acceptable containers for acidic wastes may include those made of plastic, steel lined with plastic, or fiberglass. Acceptable containers for other wastes include, but are not limited to, steel, fiberglass, plastic, steel lined with plastic, and fiber drums and boxes, wooden cases, and fiber sacks. Solvent wastes are frequently stored in steel drums bearing DOT identification of 17 E or H. Alkaline wastes may be stored in plastic containers or containers manufactured from carbon steel. Fiber sacks may be used to store, among other materials, contaminated debris or soils. New types of containers are routinely being developed and approved by the United States Department of Transportation (USDOT); USDOT and Performance Oriented Packaging Standards will dictate the shipment in, and use of, alternate containers meeting regulated performance requirements. HRIW may receive waste in any appropriate USDOT approved or performance specified container for management at the facility. Site-generated waste may be accumulated in specially designed containers specific to the plant process equipment.

D-3d Condition of Containers: 40 CFR 264.171

Facility personnel will inspect all containers for evidence of leakage, deterioration, or severe corrosion as part of the incoming load and unloading procedures at HRIW. Containers are also routinely inspected while in storage. Inspection schedules are discussed in Section F, Inspection Plan. Containers exhibiting evidence of leakage, deterioration which would affect the structural integrity of the container, or severe corrosion will be transferred into overpacks, or containers in good condition, or the wastes may be transferred directly into tanks or treatment units. Open containers, improper storage in CMUs, and evidence of spills and leaks are among the focal points of inspections. Transporters of Hazardous Waste are required to meet the specifications in the USDOT regulations in 49 CFR Part 178 Subparts A through J, 49 CFR 173 Subparts J through O, and the requirements of 49 CFR 172.101 with respect to design and use of containers. Changes in these and other regulations brought about by USDOT's Performance Oriented Packaging Standards will be observed, by HRIW or generators sending shipments of waste to HRIW, as they are made effective.

Any containers found to be inadequately or improperly identified or deficient in the required information may be staged in a holding area until the deficiency can be resolved.

D-3e Response to Leaks: 40 CFR 264.171

Because the secondary containment system is designed to prevent storm water run-on, liquids found on the floor of a CMU will be either blown precipitation or leaks of stored materials. When an inspection reveals liquid within a contained area, the source will be identified if possible. If liquids are discovered, they will be removed within twenty-four (24) hours of detection, or as soon as practical. The identification of the origin of the liquid may be accomplished in a number of ways, using a variety of inspection techniques. Visual inspection of the condition of containers for localized staining or leakage adjacent to a particular container is the technique most likely to be employed to trace the source of a leak. If this measure fails, a sample of the liquid in the containment area will be analyzed for a range of parameters based upon the possible contents of the containers in the affected CMU. This process should indicate the waste stream type from which the leaking waste may have originated. All containers holding that waste stream type within the CMU will then be checked for leaks until the leak is found.

Wastes from the leaking container will be managed as described in D-3d. Liquid in the containment area may be transferred to an appropriate container, or to one or more storage tank(s), using a portable pump. Other suitable methods using absorbents, vacuum systems, etc., may also be used to manage spills. Any container into which wastes are transferred will be appropriately identified as to the type of waste stored in it. Minor quantities of liquids may be absorbed, collected, and placed in an appropriately identified container.

D-3f Special Requirements for Ignitable and Reactive Wastes: 40 CFR 264.176.

Ignitable and reactive wastes will be segregated from incompatible materials within CMUs. Segregation may involve placement in separate CMUs, or use of portable secondary containment units. Containers of ignitable or reactive wastes are stored at least fifty (50) feet from the facility property boundary. CMUs that may contain ignitable or reactive wastes include C100, C200, C400, C500, C600, C700, L100, P100, P200, D100, D200, D300, D400, I200, I300, I400, J100, J200, J300, J400, J500, J600, J700, and all but the west twenty-five (25) feet of I100. Because of the requirements of 40 CFR 264.176, ignitable or reactive wastes will not be stored in CMUs C300, B100, B200, B300, B400, and the west twenty-five (25) feet of I100. Measures to prevent accidental ignition of ignitable wastes include the prohibition of smoking, use of non-sparking tools, and enforcement of procedures to control burning and welding in areas where these wastes are stored. Section F, Inspection Plan, addresses these procedures in detail.

D-3g Special Requirements for Incompatible Wastes: 40 CFR 264.177.

During unloading procedures, the containers will be visually checked. Those containers selected for sampling and analysis will be opened and sampled as described in the WAP (see Section C, Waste Characterization). Sampling may occur on the unloading platform, in the working area, in a CMU, or prior to unloading, on the transport vehicle. Once samples have been obtained, the containers will be re-closed and will remain staged in accordance with the WAP until the incoming load procedures are completed. If incoming load procedures are not completed within 72 hours, the containers will be transferred into an appropriate CMU, as determined using available information (e.g., manifest, Waste Profile Sheet, etc.). Containers which are not already in a CMU will be moved into a CMU after the incoming load procedures are completed or within 72 hours. Should a container of waste be determined to be incompatible with the other wastes stored in a CMU as a result of analysis, it will be segregated from incompatible wastes. Portable containment units may be used to facilitate segregation.

Each RCRA CMU is equipped with secondary containment. These containment systems have sufficient capacity to contain a minimum of ten (10) percent of the volume of the maximum container capacity of wastes with free liquids permitted for storage in that unit. Wastes which are incompatible may be stored in adjacent CMUs separated by either diking, building walls, or other device.

The seven (7) container storage buildings are subdivided into individually contained CMUs. Adjacent CMUs may be used to manage incompatible wastes. The CMUs are used interchangeably. The criteria for CMU selection for storage of a specific waste type is based upon considerations of chemical compatibility, storage unit capacity, and operational demands.

To ensure that residues from wastes previously stored in a CMU do not contact potentially incompatible wastes about to be placed in the CMU, the following procedure will be observed. The CMU will be visually inspected when containers are removed for compatibility service change, and will be cleaned if evidence of a spill is found prior to placement of the next waste into the CMU for storage.

HRIW may transfer wastes from one container to another. In accordance with 40 CFR 264.177(b), hazardous waste will not be placed in an unwashed container that previously held an incompatible waste or material, except when that placement constitutes known and planned treatment as discussed in Section D-5, Treatment in Containers.

D-3h Transshipment of Containers of Waste:

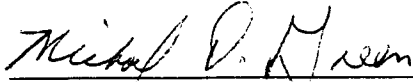
The majority of wastes received at the HRIW facility will be stored, processed, and shipped off-site. However, some wastes, primarily waste in drums, which are intended for treatment or direct disposal at off-site facilities, may be temporarily stored at HRIW. The facility may occasionally serve as a 10-day transfer station for wastes destined for incineration, disposal, or other management at another facility. This 10-day transfer will comply with the requirements of 40 CFR 263.12 and 264.1(g)(9). 10-day transfer stations are not subject to the permit requirements of 40 CFR 270 (see 40 CFR 270.1(c)(2)(vi)).

10-day transfer wastes may remain at the site for a period not to exceed ten (10) days prior to continuing the journey to the designated treatment, storage, or disposal site. 10-day transfer loads remain "in transit" during the entire stay at the site. These wastes may be off-loaded and transferred to another vehicle or to a railcar. Because these 10-day transfer loads are never accepted into the HRIW waste management system, no analyses are performed on the loads. They will, however, be identified in the Waste Tracking System.

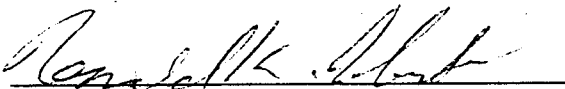
September 10, 1996

Note to File: Inspection Documentation

Daily inspections for January 16, 1996 were not documented. Inspections were performed in the course of weekday operations on these days, and those issues which occurred were addressed at that time. This will serve as documentation to this effect in the inspection record.



Michael Green, Station Manager




Ronald Robertson, Environmental Manger

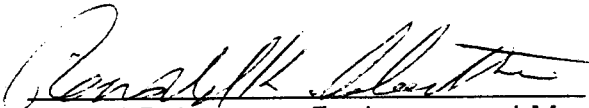
September 10, 1996

Note to File: Inspection Documentation

Daily inspections for April 5, 1996 were not documented. Inspections were performed in the course of weekday operations on these days, and those issues which occurred were addressed at that time. This will serve as documentation to this effect in the inspection record.



Michael Green, Station Manager



Ronald Robertson, Environmental Manger

September 10, 1996

Note to File: Inspection Documentation

Daily inspections for November 27, 1995 were not documented. Inspections were performed in the course of weekday operations on these days, and those issues which occurred were addressed at that time. This will serve as documentation to this effect in the inspection record.



Michael Green, Station Manager



Ronald Robertson, Environmental Manger

LAIDLAW ENVIRONMENTAL SERVICES, INC.

407 Burton Rd. Lexington, SC 29072

TRAINING COURSE ATTENDANCE RECORD

Page 1 of 1

Ex. 6 PII

Location of Training Wichita / 725

	CLEARLY PRINTED NAME	SIGNATURE	COMPANY/FAC.
1.	C. Brian Key	C Brian Key	Wichita / 725
2.	Dean A. Markham	Dean Markham	Wichita / 725
3.	RICHARD E. DABBY	Richard E. Dabby	Wichita / 725
4.	Samuel M. DeSantiago	Samuel M DeSantiago	Wichita / 725
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
13.			

The persons signed above have attended the training course marked below as described in materials provided at course. The modules have been designed to be a part of the employer's plan developed to meet the training requirements of applicable regulatory agencies. The employees have been evaluated by competency testing, which was where appropriate verbal, or written.

☒ RCRA ☒ DOT HazMat Employee
☐ Other FACILITY SPECIFIC INTRODUCTORY

☒ OSHA ☐ Additional Description

Training Supervisor: R Roberts

signature R Roberts Dates 5/30/21 thru 5/30/21

Additional trainers: _____

Training Duration 16 hrs To _____

LAW ENVIRONMENTAL SERVICE TRAINING ATTENDANCE SHEET



Course Code: _____
 Course Name: FACILITY/INTRODUCTORY TRAINING
 Location: 725 Date: 8/22 thru 23
 City, State: WICHITA KS Time: _____ to _____ Duration: 16 (total hours)

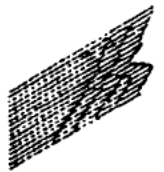
	PRINTED NAME	SIGNATURE		FACILITY NAME
1.	DON E. WEAR	<i>Don E. Wear</i>		Wichita
2.	April Leonard	<i>April Leonard</i>		Wichita
3.	Damon M Brown	<i>Damon M Brown</i>		Wichita
4.	Chris Stewart	<i>Chris Stewart</i>		Wichita
5.	Henry Schuber	<i>Henry Schuber</i>		Wichita
6.	Glenne Wimpsee	<i>Glenne Wimpsee</i>		Wichita
7.	David Patterson	<i>David A Patterson</i>		Wichita
8.	Van Luster	<i>Van Luster</i>		Wichita
9.	Kimberly Beckwith	<i>Kimberly Beckwith</i>		Wichita
10.				
11.			Ex. 6 PH	
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The above listed employees have demonstrated satisfactory performance and comprehension of the course named above.

Please note the specific verbiage required for the certificates in the space below:

Trainers: _____ Trainers Signature: _____
 (Please Print) _____
 (Please Print) _____

Page ____ of ____



LAW ENVIRONMENTAL SERVICES TRAINING ATTENDANCE SHEET



Course Code: _____

Course Name: Facility Improvement Training

Location: WICHITA 725

Date: 6/17 thru 20/96

City, State: KS

Time: _____ to _____ Duration: 16 (total hours)

	PRINTED NAME	SIGNATURE		FACILITY NAME
1.	Jeffrey Enalchart	<i>Jeffrey Enalchart</i>		<u>Jeff 725</u>
2.	Charles M. DeBree	<i>Charles M. DeBree</i>		<u>725</u>
3.	Harry L. Sills	<i>Harry L. Sills</i>		<u>725</u>
4.	Steve Shain	<i>Steve Shain</i>		<u>725</u>
5.	Ernie McCurt	<i>Ernie McCurt</i>		<u>725</u>
6.	Donner Townsend	<i>Donner Townsend</i>		<u>725</u>
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8.			Ex. 6 PII	
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The above listed employees have demonstrated satisfactory performance and comprehension of the course named above.

Please note the specific verbiage required for the certificates in the space below:

Trainers: Ron Ronsorsen

(Please Print)

Trainers Signature: Ronald M. Ronsorsen

(Please Print)

Page 1 of 1



LAW ENVIRONMENTAL SERVICE

TRAINING ATTENDANCE SHEET



Course Code: _____

Course Name: Annual RCRA Refresher

Location: Wichita - 725

Date: 8/19 thru 8/26

City, State: Wichita, KS

Time: 8:30 to 12:30 Duration: _____ (total hours)

	PRINTED NAME	SIGNATURE	FACILITY NAME
1.	Trina D. Wilson	Trina D. Wilson	725-700
2.	Bob Valeski	Bob Valeski	Wichita
3.	Jeff Olinger	Jeff Olinger	725-700
4.	GEORGE CARTER	George Carter	725
5.	Christopher Lane	Christopher Lane	725-700
6.	Charles L. Smith Jr	Charles L. Smith Jr	725
7.	Laurel Bettinger	Laurel Bettinger	Wichita
8.	Christopher R. Bechter	Christopher R. Bechter	Wichita
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Ex. 6 PII

The above listed employees have demonstrated satisfactory performance and comprehension of the course named above.

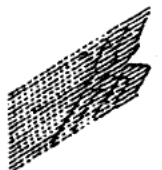
Please note the specific verbiage required for the certificates in the space below:

Trainers: _____
(Please Print)

Trainers Signature: _____

(Please Print)

Page ____ of ____



LAIDLOW ENVIRONMENTAL SERVICE TRAINING ATTENDANCE SHEET



Course Code: _____
 Course Name: Facility Introductory Training
 Location: 725 Date: 9/5 thru 9/6
 City, State: Wichita KS Time: _____ to _____ Duration: 6 (total hours)

	PRINTED NAME	SIGNATURE	FACILITY NAME
1.	CRAIG A JONES	<i>[Signature]</i>	725
2.	SCOTT DERBICK	<i>[Signature]</i>	725
3.	RAMIRO RAMIREZ	<i>[Signature]</i>	725
4.			
5.			
6.			
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Ex. 6 PII

The above listed employees have demonstrated satisfactory performance and comprehension of the course named above.

Please note the specific verbiage required for the certificates in the space below:

Trainers: _____
 (Please Print)

 (Please Print)

Trainers Signature: _____

Page ____ of ____



LAW ENVIRONMENTAL SERVICE TRAINING ATTENDANCE SHEET



Course Code: _____
 Course Name: RCRA Annual Refresher
 Location: 725 Date: 6/17 thru 6/24/10
 City, State: WILMINGTON, MS Time: _____ to _____ Duration: 8 (total hours)

	PRINTED NAME	SIGNATURE		FACILITY NAME
1.	MARK HESS	ATTACHED		725
2.	DEAN MARKHAM			725
3.	RICHARD S. SNOOK			725
4.	CORY YOUNG			725
5.	Jim Beaman			725
6.	Benny L. Lotters			725
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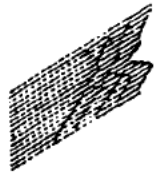
The above listed employees have demonstrated satisfactory performance and comprehension of the course named above.

Please note the specific verbiage required for the certificates in the space below:

Trainers: R. Robinson
 (Please Print)
B. Fox
 (Please Print)

Trainers Signature: [Signature]

Page 1 of 1



LAWLAW ENVIRONMENTAL SERVICES, INC.

407 Burton Rd. Lexington, SC 29072

TRAINING COURSE ATTENDANCE RECORD

Page 1 of 1

Ex. 6 PII

Location of Training WICHITA

	CLEARLY PRINTED NAME	SIGNATURE	COMPANY/FAC.
1.	Christopher R. Waechter	<i>Chris Waechter</i>	LES-Wichita
2.	Dereesa Wheeler	<i>Dereesa Wheeler</i>	
3.	Paul S. Maratz	<i>Paul S. Maratz</i>	
4.	Mike Coenen	<i>Michael P. Coenen</i>	
5.	C. Brian Key	<i>C. Brian Key</i>	
6.	Anthony A. Resendez	<i>Anthony A. Resendez</i>	
7.	Trina Wilson	<i>Trina D. Wilson</i>	785-700
8.	Chris LANE	<i>Chris Lane</i>	
9.	Gerry F. Stafford	<i>Gerry F. Stafford</i>	
10.			
11.			
12.			
13.			

The persons signed above have attended the training course marked below as described in materials provided at course. The modules have been designed to be a part of the employer's plan developed to meet the training requirements of applicable regulatory agencies. The employees have been evaluated by competency testing, which was where appropriate verbal, practical or written.

☒ RCRA ☐ DOT HazMat Employee
☐ Other FACILITY INSPECTOR/DAILY

☐ OSHA ☐ Additional Description _____

Training Supervisor: R. Scherba

R. Scherba signature Dates 5/1/96 thru _____

Additional trainers: _____

Training Duration 8:30 To 10:30

**MICHIGAN DEPARTMENT
OF NATURAL RESOURCES**

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Please print or type:

Form Approved EPA 336-108-0000 Expires 9-30-94

**UNIFORM HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

KSD007246846

Manifest
Document No.

2. Page 1 of 1

Information in the shaded areas
is required by Federal
law.

3. Generator's Name and Mailing Address

HYDROCARBON RECYCLERS INC.
2549 N. NEW YORK
WICHITA, KS 67219

4. Generator's Phone (316)

268-7500

ATTN: GARY BURNS

5. Transporter 1 Company Name

6. US EPA ID Number

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

10. US EPA ID Number

CYANOKEM, INC.
1238 SCHAEFER HWY.
DETROIT, MI 48227

MID098011992

11. US DOT Description (including Proper Shipping Name, Hazard Class, and
HM ID NUMBER).

12. Containers

No. Type

13. Total
Quantity

14. Unit
W/Vol

N/H

a. NO. WASTE CORROSIVE LIQUID, N.O.S., 8,
UN1760, PGII (

b. NO. WASTE CORROSIVE LIQUID, N.O.S., 8,
UN1760, PGII (

c. NO. WASTE CORROSIVE LIQUID, N.O.S., 8,
UN1760, PGII (

d. NO. WASTE CORROSIVE LIQUID, N.O.S., 8,
UN1760, PGII (

15. Additional Descriptions for Materials Listed Above

15. Special Handling Instructions and Additional Information

24 hr EMERGENCY PHONE RESPONSE: 8am-5pm call 316-261-2766 or 316-268-7500
5pm-8am call INFOTRAC @ 1-800-535-5053 (facility 725-700)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by
proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway
according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined
to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the
present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste
generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Date

Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest

Printed/Typed Name

Signature

Date

Month Day Year

MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-282-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE

Please print or type.

Form Approved EPA Form 8700-22 (Rev. 9/88)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

K8D00724684

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

HYDROCARBON RECYCLERS INC.
2549 N. NEW YORK
WICHITA, KS 67219

A. State manifest document number
MI 720306

4. Generator's Phone (316) 268-7500

ATTN: GARY BURNS

5. Transporter 1 Company Name

6. US EPA ID Number

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

CYANOKEM, INC.
1238 SCHAEFER HWY.
DETROIT, MI. 48227

10. US EPA ID Number

MID098011992

B. State Generator ID No.

C. State Transporter ID No.

D. Transporter Phone No.

E. State Transporter ID No.

F. Transporter Phone No.

G. State Facility ID No.

H. Facility Phone No.

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and HM ID NUMBER)

a. X RO. WASTE CORROSIVE LIQUID, N.O.S., 8, UN1760, PGII (

b. X RO. WASTE CORROSIVE LIQUID, N.O.S., 8, UN1760, PGII (

c. X RO. WASTE CORROSIVE LIQUID, N.O.S., 8, UN1760, PGII (

d. X RO. WASTE CORROSIVE LIQUID, N.O.S., 8, UN1760, PGII (

12. Containers No. Type

13. Total Quantity

14. Unit Wt/Vol

15. Waste No. N/H

16. Additional Descriptions for Materials Listed Above

15. Special Handling Instructions and Additional Information

24 hr EMERGENCY PHONE RESPONSE: 8am-5pm call 316-261-2766 or 316-268-7500
5pm-8am call INFOTRAC @ 1-800-535-5053 (facility 725-700)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Date

Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest

Printed/Typed Name

Signature

Date

Month Day Year

FORM 1

Generator Name/Location Hydrocarbon Recyclers

EPA ID Number KSD 007246846

Manifest Number 3730306

Waste Analysis Available ☒ Yes ☐ No ☒ On file at facility Date 2-6-96

PROFILE # (ST or W #)	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA.	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable).	TREATABILITY GROUP Please check the applicable treatability group.		CALIFORNIA LIST WASTES	REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, F001-F005 & F039
a	b	c	d	Nonwastewater >1% TOC & >1% TSS e	Wastewater f	List all applicable constituents from key below g	List all applicable constituents from Table I and/or key below h
56006-12897		D002	5		X		
↓		D008			X		
↓		D007			X		
56010-12884		D002	5		X		
11		D007			X		

CALIFORNIA LIST WASTES (for Column g)

- 1) PCB ≥ 50 ppm 2) Halogenated Organic Carbon (HOC's) ≥ 1000mg/l 3) Nickel (Ni) ≥ 134mg/l 4) Thallium (Tl) ≥ 130mg/l

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

- | | | | |
|----------------------------------|-----------------------------------|----------------------------|--|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2, Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o, m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature [Signature] Print Name James Brantner

* Selection of D001 regulated constituents is not required for wastes treated at ThermalKEM or Norlite. Selection of D001 constituents is required ONLY for low TOC ignitable liquids managed in non-CWA/non-CWA-equivalent/non-Class I SDWA systems.

RECYCLE / REUSE

USE PRINT OR TYPE (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

KSD00724684604086

Manifest
Document No.

2. Page 1
of 1

Information in the shaded areas
is not required by Federal law.

3. Generator's Name and Mailing Address: HYDROCARBON RECYCLERS INC.
2549 N. New York
Richita, Ms. 37219

A. State Manifest Document Number

LA A 3318055

B. State Generator's ID

4. Generator's Phone (516) 268-7500 Attn: Gary Burns

5. Transporter 1 Company Name
B MONT SPECIAL COMMODITIES

6. US EPA ID Number

ARD031208571

C. State Transporter's ID

D. Transporter's Phone 800-723-4868

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

MAVINE SMILE PROCESSORS, INC.
2125 HIGHWAY 80 EAST
MERIDIAN CITY, LOUISIANA 70060

10. US EPA ID Number

LA D031087706

G. State Facility's ID

H. Facility's Phone

(504) 681-3101

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers
No. Type

13. Total
Quantity

14. Unit
Wt/Vol

15. Waste No.

a. 30, WASTE PAINT RELATED MATERIAL, 1. UN1203,
PGII (toluene, acetone)

002 C W 03030 P D001

b. NONE REGULATED WASTE-NON HAZARDOUS WASTE.
TER 40 & 49 CFR

002 C W 03040 P NONE

c.

d.

J. Additional Descriptions for Materials Listed Above

28a. 9504259-DG01
28b. 950477-none

K. Handling Codes for Wastes Listed Above

28a. M052
28b. NR1

15. Special Handling Instructions and Additional Information

4hr Emergency Phone: 504-261-2766 or 516-268-7500
24hr Emergency: Call INFOTRAC @ 1-800-535-5053 (facility/25-700)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimize the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name
JAMES R. BRATCHER

Signature

Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 2	Information in the shaded areas is not required by Federal law
3. Generator's Name and Mailing Address Sacramento Army Depot, Mail Stop 50 8350 Fruitridge Road Sacramento, CA 95813-5050		C 4 0 1 2 1 0 0 1 2 0 7 8 0 1	9 1 8 0 1 9	A. State Manifest Document Number 90719809	
4. Generator's Phone () 916 388-2480 Emergency #916/388-2910		5. Transporter 1 Company Name U.S. Pollution Control, Inc.		B. State Generator's ID H A H Q 3 6 0 3 3 8 8 7	
6. Transporter 1 US EPA ID Number I X P 9 8 8 0 5 2 4 8 4		7. Transporter 2 Company Name Southern Pacific Railroad		C. State Transporter's ID 305190	
8. Transporter 2 US EPA ID Number C A P 0 0 6 9 1 3 2 0 6		9. Designated Facility Name and Site Address HRI/Hydrocarbon Recycler Inc. 2549 N. New York Street Wichita, KS 67219		D. Transporter's Phone 800/877-0434	
10. US EPA ID Number K S D 0 0 7 2 4 6 8 4 6		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. "R.Q." Waste Poisonous Solid, Corrosive, N.O.S., 6.1, UN 2928, PG III (Cadmium, Mercury) b. c. d.		E. State Transporter's ID F. Transporter's Phone 510/891-7619 G. State Facility's ID H. Facility's Phone 316 268-9490	
12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol	
0 1 0 1 D M		0 1 0 3 1 0 2		P	
15. Special Handling Instructions and Additional Information A.) WI92-4031 D.O. 298 LI 7 ERG 59 (Mercury-Cadmium Batteries for Storage) Emergency Phone #916/643 388-2910 Shipping papers & C.D. to be forwarded to USPCI Govt. Revenue Department, Suite 500, 515 W. Greens Rd., Houston, TX 77067. Always wear proper protective equipment when handling hazardous materials.		16. Generator's Certification: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.		Director will call back Pete Gallenberger (2/29/96) @ 2:40pm	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name: PATRICK J. YATNEY Signature: [Signature] Month Day Year: 1/10/92		18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: SUSAN NOO Signature: [Signature] Month Day Year: 1/10/92		19. Discrepancy Indication Space	
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name: Karyn L. Coker Signature: [Signature] Month Day Year: 1/10/92		Do Not Write Below This Line		White: TSDF SENDS THIS COPY TO DONS WITHIN 30 DAYS	



April 19, 1995

Ms. Kelley Birch
Defense Reutilization & Marketing Region
DRMR-OHA
Defense Depot Ogden, Building 2A-1
Ogden, UT 84407-5001

RE: Contract DLA 200-91-D-0079, Del. Order 298, LI 7.

Dear Ms Birch:

USPCI is enclosing a copy of the referenced Delivery Order, as well as a copy of the applicable manifest and the Material Data Safety Sheet (MSDS) for the batteries received and stored in our TRS-Wichita facility. As you can see from the MSDS, the generator (Sacramento Army Depot) mis-identified the waste. USPCI requests permission from the government to legally dispose of these batteries. This disposal will be at no additional cost to the government and will allow USPCI and DRMS to move one step closer to final close-out of the referenced contract. USPCI requests that DRMS do all it can to help expedite this request, as this is the oldest material currently in our Wichita facility.

If I can provide any additional information, please call me at (303) 938-5588.

Sincerely,

A handwritten signature in cursive script that reads "Ronald B. Costello".

Ronald B. Costello
Senior Contract Administrator

RBC/js
Enclosure:



DEFENSE LOGISTICS AGENCY
DEFENSE REUTILIZATION AND MARKETING SERVICE
500 WEST 12TH STREET, BLDG 2A-1
OGDEN, UTAH 84407-5905



IN REPLY
REFER TO

DRMS-PMW (K. Birch/(801)399-6829/jc)

2 May 1995

SUBJECT: DLA-200-91-D-0079, Delivery Order 0298,
Line Item 0007.

Mr. Ronald Costello
U.S. Pollution Control, Inc.
5665 Flatiron Parkway
Boulder, CO 80301

Dear Mr. Costello:

Reference your letter of 19 Apr 95, subject as above.

The batteries in question were not misidentified by the generator. They were described and shipped based on a TCLP conducted by USPCI on delivery order 0072, Line Item 1. The TCLP conducted was on this specific container. Your reference to basing the misidentification on an MSDS is invalid, as the proper analysis was conducted to demonstrate the waste's characteristics.

The waste must be disposed of in accordance with the TCLP outlined above and enclosed.

Should you have any questions, please phone.

Sincerely,

Kellie Birch
KELLIE BIRCH
Contracting Officer

Encl

May 5, 1995

Dave Harris,

per our telephone discussion today I am sending you a fax which clearly shows that the 918 battery is a non-rechargeable "zinc carbon" type battery. The MSDS which was sent to you covers all zinc carbon batteries made by Rayovac.

As the MSDS indicates, the batteries are "no mercury formulas" and have passed a series of TCLP tests to show that they have no hazardous waste characteristics.

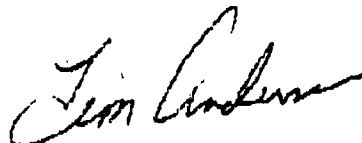
Rayovac does not formulate mercury, lead, or cadmium into its zinc carbon products. As a matter of fact we have had extensive programs in place to remove mercury and cadmium from formulations.

Unless your local government has some local restrictions we are not aware of, the landfilling of these batteries is proper and legal in any properly operating landfill as a general waste.

If you should need further information, or wish us to directly contact those who require further information, please feel free to call me as well as others I will list below.

Timothy J. Anderson
Senior Project Engineer-Corporate Environmental
608-275-4824

Roderick Donaldson
Technical Services Manager
608-274-4739



Marshall Beason
Environmental Technologist
608-275-4856
Our common fax is 608-275-4992

A Handy Cross-Reference Guide of Comparative and Interchangeable Batteries

Before using this Battery Cross-Reference Guide, please read the notes on this page carefully.

There are four separate groupings of popular battery types in this Guide: Non-Rechargeable, Rechargeable, Lithium, and Zinc Air.

NON-RECHARGEABLE BATTERIES

For further information, suffixes have been added to certain NEDA numbers which fall into major categories listed below. These batteries are not designed by battery manufacturers to be recharged and are usually referred to as primary or non-rechargeable:

A	Alkaline	F	Farnesstock	P	Photographic
AC	Alkaline Industrial	LF	Lithium Fe2S	SO	Silver Oxide
AP	Alkaline Photographic	LB	Lithium (CF)x	SOP	Silver Oxide
C	Industrial	LC	Lithium MnO2		Photographic
CD	Industrial Heavy Duty	M	Mercury	Z	Zinc Air
D	Heavy Duty	MD	Mercury Premium	ZD	Zinc Air Heavy Duty
F	General Purpose	MP	Mercury Photographic	No Suffix	Zinc Carbon
				Letter	

RECHARGEABLE BATTERIES

Certain batteries use electrochemical systems which are reversible and can accept electrical energy and transform it back into stored chemical energy. These are variously called secondary or rechargeable batteries:

10,000 and 11,000 Series
HC Series

Nickel Cadmium
Nickel Cadmium High Capacity

One comparatively recent development provides adapters in which an AA or C battery can be inserted for C or D applications.

Manufacturers of rechargeable batteries offer a choice of charges for their nickel-cadmium models. One utilizes a special module for charging the same size batteries, while larger models can charge two or four AAA, AA, C or D batteries plus 9-volt batteries. Manufacturers generally recommend that their NiCad batteries not be charged in other companies' chargers.

PLEASE NOTE: The NEDA Battery Cross-Reference Guide is not a standard, testing or evaluation listing, nor does the association sell batteries.

1990 NEDA BATTERY CROSS-REFERENCE GUIDE

The NEDA Battery Cross-Reference Guide, published for over 30 years by the National Electronic Distributors Association, is compiled as a service to all segments of the industry with the cooperation of battery manufacturers for the purpose of facilitating sales of batteries. Buyers, sellers, and users will find the Guide useful in determining interchangeability of most commonly-used batteries.

Battery brands listed include those with a wide selection of sizes and types ordinarily found in electronics distribution throughout the United States and Canada.

Care should be taken to protect batteries from extremes of heat and cold while in storage.

Attention should be paid to proper rotation of battery inventories to preclude holding of stocks past advisable shelf-life periods.

It is recommended that the battery in any electronic equipment be replaced with the same type and size battery specified by the manufacturer. Using the wrong batteries may result in shortened battery life or possible damage to the camera, calculator, hearing aid, watch, instrument, or other equipment.

The information in this Guide is supplied by manufacturers in the belief that their batteries are interchangeable for recommended applications, physical size, terminals and voltages. Equivalent performance is not necessarily implied.

Since the characteristics of individual batteries are sometimes modified, manufacturers who are designing their product to use a particular battery should contact the various battery suppliers for verification of specifications.

Battery users seeking a reference for battery standards will also find the current American National Standards Specifications for Dry Cells and Batteries, ANSI C19.1, an excellent source of data on cell sizes and other useful battery information. It may be ordered from the American National Standards Institute, 1430 Broadway, New York, NY 10018, (212) 354-3300. Batteries are identified by joint ANSI/NEDA numbers.

FOR BATTERY INFORMATION

Specific information regarding their company's batteries listed in this Guide may be obtained by contacting the following:

Duracell Inc., Attn: OEM Group 1-800-431-2556 or 5, Attn: BID Administrator 1-800-782-7820. Address: Berkshire Industrial Park, Bethel, CT 06810.
Duracell Hearing Aid Batteries, Sales Information, Chuck Walton, Berkshire Industrial Park, Bethel, CT 06891, (203) 756-4743.
Eastman Kodak Co., c/o Ultra Technologies, Inc., Route 88 South, P. O. Box 267, Newark, NY 14513, (800) 242-2424 or (315) 332-7100.
Eveready Battery Co., Inc., Checkerboard Square, St. Louis, MO 63164, (314) 982-2000.
Panasonic Industrial Co., Battery Sales Division, P.O. Box 1511, Secaucus, NJ 07096-1511, (201) 392-6601.
Rayovac Corp., 601 Rayovac Drive, P. O. Box 4960, Madison, WI 53711-0960, Industrial: (800) 331-4582, Consumer: (800) 223-8533.
Toshiba Batteries, 82 Tolowa Road, Wayne, NJ 07470, (201) 628-8000.
VARTA Batteries, Inc., 300 Executive Blvd., Emsford, NY 10523, (914) 692-2500.



Published as an Industry Service by the
National Electronic Distributors Association
35 E. Wacker Drive, Suite 3202
Chicago, IL 60601
(312) 558-8114
(312) 558-1069 (Fax)



NEDA BATTERY GUIDE

NON-RECHARGEABLE BATTERIES

VOLTAGE	NEDA NUMBER	DURACELL	EASTMAN KODAK	EVEREADY	PANASONIC	RAYOVAC	TOSHIBA	VARTA	OTHER
22.5	225			420*					BA-15A
1.5	700			711					BA-208
3	704			750*					
4.5	708A	MN1203							BA-2
22.5	710			763					BA-291/U
300	722			493					
225	728			489					
240	729			491*					
310	741	PF497		437					
1.5	900			735		900			BA35
3	901								BA-223/U
8	902			708					BA-222U
7.5	903			715		903			BA-804/U
7.5	903AC	PC303		EN715					
9	904			716		904			BA-207/U
9	904AC			EN716*					
1.5	905	M905S*		IS8		500.S			
1.5	905FC			IF8*					
1.5	906			5A8					
1.5	906FC			EA6F					
8	907			1461		641			BA-849/U
8	908			509	4F	941			BA-200/U
5	908A	M908		528					
5	908AC	PC908							
6	908C	M908SHD*		EV90 H890*		GP-8V* EV-FP		430	500
8	908CD	M908SHD*		EV90HP				431	
8	908CS			EV230					
6	908D	M908SHD*		1209		944		430	FAMEX
1.5 (N)	910A	MN9100	KN	E90	AMS	810	LR1N	4001	
1.5 (N)	910C						RTU		
1.5 (N)	910F	M910		904*					UM-5 (SG)
1.4	910M			E401E		9401*			
7.5	912			1562*					
6	915			5106		942			BA803/U 467*
6	915A			528					
6	915AC	PC915							
6	915C	M915SHD*		EV106					
6	915D	M915SHD*				945			
6	916			731		918			
3	918A	MN918		521					
3	918AC	PC918							
6	918C	M918SHD*		EV31					
6	918D	M918SHD*		1231		928			



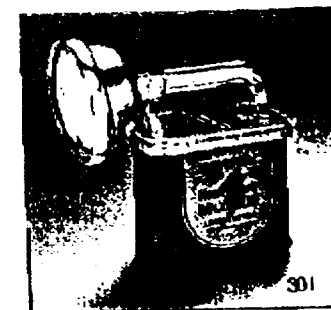
6V-HDM

Rayovac Lanterns and Lantern Batteries.

Rayovac provides a wide assortment of lanterns and lantern batteries for every need and every price range. Our lantern batteries are engineered for rugged applications and each meets the Environmental Protection Agency (EPA) requirements for landfill disposal. Our versatile all-purpose beam lanterns provide reliable lighting for a variety of uses.

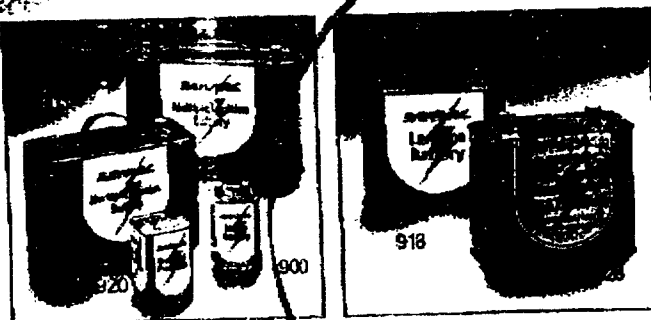
Lantern Batteries

- 6V-GP 6-Volt Spring Terminals General Purpose
- 6V-HD 6-Volt Spring Terminals Heavy Duty
- 6V-HDM 6-Volt Spring Terminals Heavy Duty Maximum™
- 941 6 Volt Spring Terminals General Purpose
- 942 6 Volt Screw Terminals General Purpose



301

- 944 6 Volt Spring Terminals Heavy Duty Maximum™ HD-B-12V
- 945 6 Volt Screw Terminals Heavy Duty Maximum™ Lanterns
- 918 6 Volt Screw Terminals General Purpose 301
- 926 12 Volt Screw Terminals General Purpose KFL
- 928 6 Volt Screw Terminals Heavy Duty Maximum L298 S
- 900 1.5 Volt Hobby Screw Terminals L298
- 903 7.5 Volt Emergency Screw Terminals
- 904 9 Volt Emergency Screw Terminals L13
- 920 6 Volt Barricade Socket Terminals L295-B
- 922 12 Volt Emergency Screw Terminals L295-S
- 541 6 Volt Electric Fences Screw Terminals LM10-S



918

920

900



Bren-Tronics inc.

"Battery Designs From Prototype To Production"

10 Brayton Court, Commack, N.Y. 11725
(516) 499-5155 • Fax (516) 499-5504

Fax

TO: Chris FROM: Jeane

COMPANY: _____ SUBJ: MDS

ADDRESS: _____

PHONE: 316-268-7500 DATE SENT: 3/24/95

FAX: 316-268-7555 NO. OF PAGES INCLUDING COVER: 3

MESSAGE:

Material Safety Data Sheet

May be used to comply with
OSHA's Hazard Communication Standard,
29 CFR 1910.1200. Standard must be
consulted for specific requirements.

U.S. Department of Labor

Occupational Safety and Health Administration
(Non-Mandatory Form)

Form Approved

OMB No. 1218-0072

IDENTITY (As Used on Label and List)

ZINC CARBON BATTERY P/N BA-8

Note: Blank spaces are not permitted. If any item is not applicable, or no
information is available, the space must be marked to indicate this.

Section I NSN#6135-00-120-1027

Manufacturer's Name
BREN-TRONICS INC

Emergency Telephone Number

(516) 499-5155

Address (Number, Street, City, State, and ZIP Code)
10 BRAYTON CT.

Telephone Number for Information

(516) 499-5155

COMMACK, N.Y. 11725

Date Prepared

91MAR15

Signature of Preparer (optional)

Section II — Hazardous Ingredients/Identity Information

Hazardous Components (Specific Chemical Identity; Common Name(s))	CSHA PEL	ACGIH TLV	Other Limits Recommended	% (approx.)
Zinc (Zn)	15 mg/m ³	10 mg/m ³		29
Manganese Dioxide (MnO ₂)	5 mg/m ³ (C)	5 mg/m ³ (C)		37
Zinc Chloride (ZnCl ₂)	1 mg/m ³	1 mg/m ³	2 mg/m ³ (STEL)	9

Section III — Physical/Chemical Characteristics

Boiling Point (°) C Zn (907)	Specific Gravity (H ₂ O = 1)
ZnCl ₂ (732) MnO ₂ (N/A)	Zn (7.14), MnO ₂ (5.0), ZnCl ₂ (2.9)
Vapor Pressure (mm Hg.)	Melting Point (°) C
Zn (1) @ 487°C, MnO ₂ (N/A)	Zn (420), MnO ₂ (535), ZnCl ₂ (283)
Vapor Density (AIR = 1)	Evaporation Rate
N/A	(BUTYL Acetate = 1) Zn MnO ₂ (N/A)
Solubility in Water	
Zn (0%) MnO ₂ (0%) ZnCl ₂ (432g/100cc)	

Appearance and Odor

Grey

Section IV — Fire and Explosion Hazard Data

Flash Point (Method Used)	N/A	Flammable Limits	N/A	LEL	UEL
Extinguishing Media	N/A				

Special Fire Fighting Procedures

Fire fighters should use self-contained breathing apparatus when a large number of
cells are involved.

Unusual Fire and Explosion Hazards

Cells may release toxic fumes when battery is exposed to fire.

Section V — Reactivity Data

Stability	Unstable		Conditions to Avoid
	Stable	X	DO NOT short circuit. DO NOT heat, disassemble or recharge.

Incompatibility (Materials to Avoid)

Hazardous Decomposition or Byproducts

When heated, may emit hazardous fumes of zinc.

Hazardous Polymerization	May Occur		Conditions to Avoid
	Will Not Occur	X	N/A

Section VI — Health Hazard Data

Routes of Entry:	Inhalation?	YES	Skin?	YES	Ingestion?	YES
------------------	-------------	-----	-------	-----	------------	-----

Health Hazards (Acute and Chronic)

N/A

Carcinogenicity:	NTP?	NONE	IARC Monographs?	NONE	CSHA Requested?	NONE
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Signs and Symptoms of Exposure

Metal fume fever symptoms appear 4 to 12 hours after exposure. Includes fever and shaking chills which generally disappear after 24 hours.

Medical Conditions

Generally Aggravated by Exposure

An acute exposure will not generally aggravate any medical condition.

Emergency and First Aid Procedures

If accidentally ingested, see physician promptly. If leakage from cell contacts skin or eyes flush with water, see physician.

Section VII — Precautions for Safe Handling and Use

Steps to Be Taken in Case Material is Released or Spilled

Avoid skin and eye contact. DO NOT inhale vapors.

Waste Disposal Method

In small quantities, batteries may be disposed of with household trash. DO NOT incinerate. Dispose of large quantities in accordance with local regulations.

Precautions to Be Taken in Handling and Storing

Store in cool place, prevent condensation. DO NOT recharge. DO NOT short circuit.

Other Precautions

Install cells in accordance with equipment instructions. Replace all batteries in equipment at the same time. Do not mix battery systems such as zinc carbon and alkaline in same equipment.

Section VIII — Control Measures DO NOT attempt to recharge. DO NOT incinerate.

Respiratory Protection (Specify Type)

As in any fire situation use self-contained breathing apparatus (SCBA).

Ventilation	Local Exhaust		Special
	Mechanical (General)		Other After a fire, provide ventilation

Protective Gloves

When handling leaking batteries.

Eye Protection

Safety glasses when handling leaking batteries.

Other Protective Clothing or Equipment

N/A

Work Hygienic Practices

N/A

RAYOVAC CORPORATION
301 Rayovac Drive
Jackson, WI 53711-0980
Tel: (608) 275-3340
Fax: (608) 275-3972

1. We would like to inform our customers that these batteries are exempt articles and are not subject to the 29CFR 1910.1200 CSHA requirement and the sheets are supplied as a service to you.
2. Independent certified laboratory analysis through TCLP testing have indicated these Rayovac battery types to have no hazardous waste characterization and can be recycled if all other Federal, State and local regulations (per 40 CFR, Part 261.24) are complied with.

1. IDENTIFICATION

PRODUCT NAME: Zinc-Chloride Battery (an article of commerce) - No Mercury, No Cadmium Formula (formerly Zinc-Carbon Battery)

SIZES: All sizes - Including Round Cells, 9-Volt and Lantern (Multi-Cell) Batteries

EMERGENCY TELEPHONE NUMBER: (608) 275-4856 or (608) 275-4783

DATE: 01/01/93

APPROVED BY: Marshal Beason Jr

MJB

2. HAZARDOUS INGREDIENTS

INGREDIENT NAME	%	TLV AND SOURCE (UNITS)
1. Manganese Dioxide	28 - 32	5.0 mg/M ³
2. Zinc	16 - 20	**124.0 mg/M ³
3. Carbon	7 - 13	3.5 mg/M ³
4. Zinc Chloride	6 - 10	1.0 mg/M ³ (fumes)
5. Lead	< 0.2	0.15 mg/M ³
6. Cadmium	< 0.0005	0.05 mg/M ³
7. Mercury	< 0.0001 (background trace)	0.05 mg/M ³

* ACGIH Threshold Limit Values for Chemical Substances, 1989-1990

** Irving Sax, 1989

3. PHYSICAL DATA

BOILING POINT @ 760 MM HG (C°):	NA
VAPOR PRESSURE (MM HG AT 25°C):	NA
VAPOR DENSITY (AIR = 1):	NA
DENSITY (GRAMS/CC):	NA
PERCENT VOLATILE BY VOLUME (%):	NA
EVAPORATION RATE (BUTYL ACETATE = 1):	NA
PHYSICAL STATE:	NA
SOLUBILITY IN WATER (% BY WEIGHT):	NA
pH:	NA
APPEARANCE AND ODOR:	NA

4. FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (METHOD USED):

NA

FLAMMABLE LIMITS IN AIR (%):

NA

LOWER (LEL):

NA

UPPER (UEL):

NA

EXTINGUISHING MEDIA:

In bulk storage areas, use foam or dry powder. Water may cause electrical shorts.

AUTO-IGNITION:

NA

SPECIAL FIRE FIGHTING PROCEDURES:

As with any fire, wear self-contained breathing apparatus to avoid inhalation of hazardous decomposition products.

SPECIAL FIRE AND EXPLOSION HAZARDS:

Like any sealed container, battery cells may rupture when exposed to excessive heat; this could result in the release of corrosive materials.

5. HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE (TLV) AND SOURCE:

NA

EFFECTS OF OVEREXPOSURE:

None, unless battery ruptures (see below).

EMERGENCY FIRST AID PROCEDURES:

Skin and Eyes:

1. In the event that battery ruptures, flush with copious quantities of water. Get immediate medical attention for eyes. Wash skin with soap and water.

6. REACTIVITY DATA

STABLE OR UNSTABLE

Stable

INCOMPATIBILITY (MATERIALS TO AVOID):

NA

HAZARDOUS DECOMPOSITION PRODUCTS:

Oxides or fumes of Mn, Zn, Pb and Sn

DECOMPOSITION TEMPERATURE (°F):

NA

HAZARDOUS POLYMERIZATION:

May occur _____ May not occur _____

CONDITIONS TO AVOID:

Avoid electrical shorting.

7. SPILL OR LEAK PROCEDURES

PROCEDURES TO CONTAIN AND CLEAN UP LEAKS OR SPILLS:

In the event of battery rupture, collect all released material in a plastic bag for waste disposal.

REPORTING PROCEDURE:

Report all spills in accordance with State and Local regulations. Individual cells do not contain reportable quantities of any substance on SARA or CERCLA lists. Exempt unless over 1,000,000 pounds of batteries are known to have been somehow opened to the environment.

WASTE DISPOSAL METHOD:

When shredded per Toxicity Characteristic Leachate Procedure parameters and tested per SW 846, 3rd Edition, Test Methods for Evaluating Solid Waste, independent certified laboratory analyses have indicated these Rayovac battery types to have no hazardous waste characteristics (per 40 CFR, Part 261.24) and can be landfilled if all other Federal, state and Local regulations are complied with.

8. PROTECTION INFORMATION

RESPIRATORY PROTECTION (SPECIFY TYPE):

As in any fire situation, use self-contained breathing apparatus (SCBA).

VENTILATION:

Local Exhaust	NA
Mechanical (General):	NA
Special:	NA
Other:	NA

PROTECTIVE GLOVES:

NA

EYE PROTECTION:

NA

OTHER PROTECTIVE CLOTHING:

NA

9. SPECIAL PRECAUTIONS

HANDLING AND STORAGE:

Store in a dry place. Storing unpackaged cells together could result in cell shorting and heat build-up.

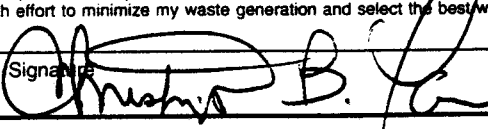
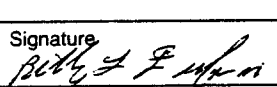
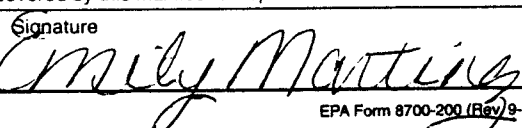
TRANSPORTATION-SHIPING:

Do not pack, store, or ship used batteries in tightly sealed containers. The slow evolution of hydrogen gas from used batteries may produce container over-pressure or explosive conditions.

10. SARA 313

Notification is not required because these products are article(s) that do not release a covered toxic chemical under the normal conditions of processing or use.

NOTE: NA = Not Available (or Not Applicable)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. K S D 0 0 7 2 4 6 8 4 6 0 4 3 3 3		Manifest Document No. 0 4 3 3 3		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address HYDROCARBON RECYCLERS, INC. 2549 N. NEW YORK STREET WICHITA, KS 67219						A. State Manifest Document Number							
						B. State Generator's ID							
4. Generator's Phone (316) 268-7500 ATTN: G. BURNS						C. State Transporter's ID							
5. Transporter 1 Company Name ENVIRONMENTAL TRANSPORTATION SERVICES						6. US EPA ID Number O K D 9 8 1 6 0 5 3 6 3							
7. Transporter 2 Company Name						8. US EPA ID Number							
9. Designated Facility Name and Site Address USPCI/GRASSY MOUNTAIN FACILITY 3 MILES EAST, 7 MILES NORTH OF EXIT 41 ON I-80 CLIVE, UT 84083						10. US EPA ID Number U T D 9 9 1 3 0 1 7 4 8							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total		14. Unit		15. Waste No.	
						No. Type		Quantity		Wt/Vol			
a. NON-REGULATED MATERIAL PER 40 & 49 CFR						0 1 6 D M		0 5 5 8 4		P		NONE	
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
11a. GM94-0762 OFF-SPEC MATERIAL													
15. Special Handling Instructions and Additional Information EMERGENCY PHONE: 8am-5pm call (800)443-7243 (ID#063199) or (ID#063216) or (316)268-7500 5pm-8am call INFOTRAC @ (800)535-5035 (facility 725-700)													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name CHRISTOPHER B. LANE						Signature 		Month 03		Day 30		Year 96	
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature 		Month 03		Day 30		Year 96	
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature		Month		Day		Year	
19. Discrepancy Indication Space <div style="text-align: right;">9100003237</div>													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						Signature 		Month 03		Day 01		Year 96	

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No. 1 4 0 7 2 9 0 2 5 1 3 0 0 1 2 8		Manifest Document No. 2		Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address Square D Company 1717 Centerpark Road Lincoln, NE 68512 4. Generator's Phone ((402) 423-6721)						A. State Manifest Document Number							
						B. State Generator's ID							
5. Transporter 1 Company Name U.S. Pollution Control, Inc.						6. US EPA ID Number TXD933052496							
7. Transporter 2 Company Name						8. US EPA ID Number							
9. Designated Facility Name and Site Address Hydrocarbon Recyclers Inc. 2549 No. New York Wichita, KS 67219						10. US EPA ID Number 1 4 0 0 0 7 2 4 6 3 4 6							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
						No. Type							
a. <input checked="" type="checkbox"/> "RQ" Hazardous Waste, Liquid, N.O.S. 9; NA3082; PGIII; (F001)						002		DM		00283		P F001	
b. <input checked="" type="checkbox"/> "RQ" Hazardous Waste; Solid; N.O.S. 9; NA3077; PGIII; (D008, F003)						002		DM		00356		P D008 F003	
c.													
d.													
J. Additional Descriptions for Materials Listed Above 11a. WI95-0183 Waste Oil 11b. WI93-4598 Tampo Rags 11c. Disposal restrictions attached						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information 24 hour emergency phone number: (402) 423-6721													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name Square D Company Gurt Christensen						Signature "on behalf of company" <i>Gurt Christensen</i>				Month Day Year 02/02/96			
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name Arthur D. Wilk						Signature <i>Arthur D. Wilk</i>				Month Day Year 02/02/96			
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature				Month Day Year			
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name Arthur D. Wilk						Signature <i>Arthur D. Wilk</i>				Month Day Year 02/02/96			

Notification of Waste Subject to Land Disposal Restrictions

Manifest number associated with waste shipment 00128	Generator Name Square D Company	<input type="checkbox"/> Supplemental Form LDR N-1a attached for listing additional codes.
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Pursuant to 40 CFR 268.7 (a), I hereby notify that this waste shipment contains one or more of the following waste(s) restricted under the land disposal restrictions for which applicable treatment standards are set forth in 40 CFR § 268.40 or 42 USC § 6924(d).

EPA Hazardous Waste Numbers

1. **F-Listed Solvents (check all that apply)**
☒ F001, F002, F003, F004, or F005 (Underlying constituents must be identified. Use Form LDR N-1b.)
☐ F005 Containing 2-Nitropropane or 2-Ethoxyethanol
☐ F001-F005 Containing carbon disulfide, cyclohexanone, methanol, or a combination of these constituents as the sole F001-5 regulated constituent.

Other Wastes

2.	List all D,F,K,U, or P Subcategory (if any) (e.g. F006, D003)	Subcategory (if any)	✓ wastewater or non-wastewater		USPCI acceptance #	California List (✓ if applicable)	Reason California List applies (list of constituent properties below)
			WW	NWW			
A	F001		<input type="checkbox"/>	<input checked="" type="checkbox"/>	WI95-0183	<input type="checkbox"/>	
B	D008		<input type="checkbox"/>	<input checked="" type="checkbox"/>	WI93-4598	<input type="checkbox"/>	
C	F003		<input type="checkbox"/>	<input checked="" type="checkbox"/>	WI93-4598	<input type="checkbox"/>	
D			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
E			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
F			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
G			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
H			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
I			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	

Concentration	Treatment Standard	Concentration	Treatment Standard
pH ≤ 2.0	Neutralize/Stabilize	Nickel	Metals Recovery/Solidification
Cyanides $\geq 1,000$	Cyanides Destruction/Stabilize	Selenium ≥ 100	Metals Recovery/Solidification
Arsenic ≥ 500	Metals Recovery/Solidification	Thallium ≥ 130	Metals Recovery/Solidification
Cadmium ≥ 100	Metals Recovery/Solidification	PCBs ≥ 30	Incineration/High Efficiency Boiler
Chromium (VI) ≥ 500	Metals Recovery/Solidification	Solid, sludge, or liquid w/HOCs $\geq 1,000$	Incineration/Carbon Adsorption/Solvent Extraction
Lead ≥ 500	Metals Recovery/Solidification		
Mercury ≥ 20	Metals Recovery/Solidification		

NOTE: "Wastewater" means a waste containing less than 1% filterable solids and less than 1% T.O.C.

3. **Hazardous Debris Notification**
☐ This hazardous debris is subject to the alternative treatment standards of 40 CFR § 268.45.

[illegible]

FACILITY: Note that "Contaminants Subject to Treatment" are those constituents applicable to a waste code listed above for which a BDAT treatment standard is established in 40 CFR § 268.40, including underlying constituents where applicable

4. **Underlying Constituents to be Monitored**
☐ F039 (Constituents to be monitored must be indicated. Use Form LDR N-1b.)
☒ F001-F005, D001 (other than residues from RORGS, or CMBST), D002, D012-D043 (Underlying constituents must be indicated. Use form LDR N-1b.)
Defined: An underlying Constituent includes any constituent listed in § 268.48, Table UTS-Universal Treatment Standards, except zinc, which can reasonably be expected to be present at the point of generation of the hazardous waste at a concentration above the constituent specific UTS treatment standard.

5. **Deadline Extensions and Variances**
Certain wastes may be subject to a deadline extension or variance (e.g., treatability variance, case-by-case extension). Describe below any extension that applies to a waste in this waste shipment (include dates and waste codes).

NOTE: Hazardous wastes that exhibit the characteristic of toxicity based on the TCLP but do not exhibit EP toxicity are newly listed wastes

Signature Amr Christensen

Curt Christensen
Printed Name

2/2/1996

Underlying Constituent		Line #	Regulated Constituent
		LDR N-1	
<input type="checkbox"/>	<input type="checkbox"/>	2-	Ethyl ether
<input type="checkbox"/>	<input type="checkbox"/>	2-	bis(2-Ethylhexyl) phthalate
<input type="checkbox"/>	<input type="checkbox"/>	2-	Ethyl methacrylate
<input type="checkbox"/>	<input type="checkbox"/>	2-	Ethylene oxide
<input type="checkbox"/>	<input type="checkbox"/>	2-	Famphur
<input type="checkbox"/>	<input type="checkbox"/>	2-	Fluoranthene
<input type="checkbox"/>	<input type="checkbox"/>	2-	Fluorene
<input type="checkbox"/>	<input type="checkbox"/>	2-	Heptachlor
<input type="checkbox"/>	<input type="checkbox"/>	2-	Heptachlor epoxide
<input type="checkbox"/>	<input type="checkbox"/>	2-	Hexachlorobenzene
<input type="checkbox"/>	<input type="checkbox"/>	2-	Hexachlorobutadiene
<input type="checkbox"/>	<input type="checkbox"/>	2-	Hexachlorocyclopentadiene
<input type="checkbox"/>	<input type="checkbox"/>	2-	HxCDDs (All Hexachlorodibenzo-p-dioxins)
<input type="checkbox"/>	<input type="checkbox"/>	2-	HxCDFs (All Hexachlorodibenzofurans)
<input type="checkbox"/>	<input type="checkbox"/>	2-	Hexachloroethane
<input type="checkbox"/>	<input type="checkbox"/>	2-	Hexachloropropylene
<input type="checkbox"/>	<input type="checkbox"/>	2-	Indeno (1,2,3-c,d) pyrene
<input type="checkbox"/>	<input type="checkbox"/>	2-	Iodomethane
<input type="checkbox"/>	<input type="checkbox"/>	2-	Isobutyl alcohol
<input type="checkbox"/>	<input type="checkbox"/>	2-	Isodrin
<input type="checkbox"/>	<input type="checkbox"/>	2-	Isosafrole
<input type="checkbox"/>	<input type="checkbox"/>	2-	Kepone
<input type="checkbox"/>	<input type="checkbox"/>	2-	Methacrylonitrile
<input type="checkbox"/>	<input type="checkbox"/>	2-	Methanol
<input type="checkbox"/>	<input type="checkbox"/>	2-	Methapyriliene
<input type="checkbox"/>	<input type="checkbox"/>	2-	Methoxychlor
<input type="checkbox"/>	<input type="checkbox"/>	2-	3-Methylcholanthrene
<input type="checkbox"/>	<input type="checkbox"/>	2-	4,4-Methylene bis (2-chloroaniline)
<input type="checkbox"/>	<input type="checkbox"/>	2-	Methylene Chloride
<input type="checkbox"/>	<input type="checkbox"/>	2-	Methyl ethyl ketone
<input type="checkbox"/>	<input type="checkbox"/>	2-	Methyl isobutyl ketone
<input type="checkbox"/>	<input type="checkbox"/>	2-	Methyl methacrylate
<input type="checkbox"/>	<input type="checkbox"/>	2-	Methyl methansulfonate
<input type="checkbox"/>	<input type="checkbox"/>	2-	Methyl parathion
<input type="checkbox"/>	<input type="checkbox"/>	2-	Naphthalene
<input type="checkbox"/>	<input type="checkbox"/>	2-	2-Naphthylamine
<input type="checkbox"/>	<input type="checkbox"/>	2-	o-Nitroaniline
<input type="checkbox"/>	<input type="checkbox"/>	2-	p-Nitroaniline
<input type="checkbox"/>	<input type="checkbox"/>	2-	Nitrobenzene
<input type="checkbox"/>	<input type="checkbox"/>	2-	5-Nitro-o-toluidine
<input type="checkbox"/>	<input type="checkbox"/>	2-	o-Nitrophenol
<input type="checkbox"/>	<input type="checkbox"/>	2-	p-Nitrophenol
<input type="checkbox"/>	<input type="checkbox"/>	2-	N-Nitrosodiethylamine
<input type="checkbox"/>	<input type="checkbox"/>	2-	N-Nitrosodimethylamine
<input type="checkbox"/>	<input type="checkbox"/>	2-	N-Nitroso-di-n-butylamine
<input type="checkbox"/>	<input type="checkbox"/>	2-	N-Nitrosomethylethylamine
<input type="checkbox"/>	<input type="checkbox"/>	2-	N-Nitrosomorpholine
<input type="checkbox"/>	<input type="checkbox"/>	2-	N-Nitrosopiperidine
<input type="checkbox"/>	<input type="checkbox"/>	2-	N-Nitrosopyrrolidine
<input type="checkbox"/>	<input type="checkbox"/>	2-	Parathion
<input type="checkbox"/>	<input type="checkbox"/>	2-	Total PCBs(sum of all isomers, or all Aroclors)
<input type="checkbox"/>	<input type="checkbox"/>	2-	Pentachlorobenzene
<input type="checkbox"/>	<input type="checkbox"/>	2-	PeCDDs (All Pentachlorodibenzo-p-dioxins)
<input type="checkbox"/>	<input type="checkbox"/>	2-	PeCDFs (All Pentachlorodibenzofurans)
<input type="checkbox"/>	<input type="checkbox"/>	2-	Pentachloroethane
<input type="checkbox"/>	<input type="checkbox"/>	2-	Pentachloronitrobenzene
<input type="checkbox"/>	<input type="checkbox"/>	2-	Pentachlorophenol
<input type="checkbox"/>	<input type="checkbox"/>	2-	Phenacetin
<input type="checkbox"/>	<input type="checkbox"/>	2-	Phenanthrene
<input type="checkbox"/>	<input type="checkbox"/>	2-	Phenol
<input type="checkbox"/>	<input type="checkbox"/>	2-	Phorate
<input type="checkbox"/>	<input type="checkbox"/>	2-	Phthalic acid
<input type="checkbox"/>	<input type="checkbox"/>	2-	Phthalic anhydride
<input type="checkbox"/>	<input type="checkbox"/>	2-	Pronamide

Underlying Constituent		Line #	Regulated Constituent
		LDR N-1	
<input type="checkbox"/>	<input type="checkbox"/>	2-	Pyrene
<input type="checkbox"/>	<input type="checkbox"/>	2-	Pyridine
<input type="checkbox"/>	<input type="checkbox"/>	2-	Safrole
<input type="checkbox"/>	<input type="checkbox"/>	2-	Silvex (2,4,5-TP)
<input type="checkbox"/>	<input type="checkbox"/>	2-	2,4,5-T (2,4,5-Trichlorophenoxyacetic acid)
<input type="checkbox"/>	<input type="checkbox"/>	2-	1,2,4,5-Tetrachlorobenzene
<input type="checkbox"/>	<input type="checkbox"/>	2-	TCDDs (All Tetrachlorodibenzo-p-dioxins)
<input type="checkbox"/>	<input type="checkbox"/>	2-	TCDFs (All Tetrachlorodibenzofurans)
<input type="checkbox"/>	<input type="checkbox"/>	2-	1,1,1,2-Tetrachloroethane
<input type="checkbox"/>	<input type="checkbox"/>	2-	1,1,2,2-Tetrachloroethane
<input type="checkbox"/>	<input type="checkbox"/>	2-	Tetrachloroethylene
<input type="checkbox"/>	<input type="checkbox"/>	2-	2,3,4,6-Tetrachlorophenol
<input type="checkbox"/>	<input type="checkbox"/>	2-	Toluene
<input type="checkbox"/>	<input type="checkbox"/>	2-	Toxaphene
<input type="checkbox"/>	<input type="checkbox"/>	2-	Bromoform (Tribromomethane)
<input type="checkbox"/>	<input type="checkbox"/>	2-	1,2,4-Trichlorobenzene
<input type="checkbox"/>	<input checked="" type="checkbox"/>	2-A	1,1,1-Trichloroethane
<input type="checkbox"/>	<input type="checkbox"/>	2-	1,1,2-Trichloroethane
<input type="checkbox"/>	<input type="checkbox"/>	2-	Trichloroethylene
<input type="checkbox"/>	<input type="checkbox"/>	2-	Trichloromonofluoromethane
<input type="checkbox"/>	<input type="checkbox"/>	2-	2,4,5-Trichlorophenol
<input type="checkbox"/>	<input type="checkbox"/>	2-	2,4,6-Trichlorophenol
<input type="checkbox"/>	<input type="checkbox"/>	2-	1,2,3-Trichloropropane
<input type="checkbox"/>	<input type="checkbox"/>	2-	1,1,2-Trichloro-1,2,2-trifluoroethane
<input type="checkbox"/>	<input type="checkbox"/>	2-	tris-(2,3-Dibromopropyl)phosphate
<input type="checkbox"/>	<input type="checkbox"/>	2-	Vinyl Chloride
<input type="checkbox"/>	<input checked="" type="checkbox"/>	2-C	Xylenes-mixed isomers (sum of o-,m-, p-xylene combinations)
<input type="checkbox"/>	<input type="checkbox"/>	2-	Antimony
<input type="checkbox"/>	<input type="checkbox"/>	2-	Arsenic
<input type="checkbox"/>	<input type="checkbox"/>	2-	Barium
<input type="checkbox"/>	<input type="checkbox"/>	2-	Beryllium
<input type="checkbox"/>	<input type="checkbox"/>	2-	Cadmium
<input type="checkbox"/>	<input type="checkbox"/>	2-	Chromium (total)
<input type="checkbox"/>	<input type="checkbox"/>	2-	Lead
<input type="checkbox"/>	<input type="checkbox"/>	2-	Mercury (retort residues)
<input type="checkbox"/>	<input type="checkbox"/>	2-	Mercury (non-retort residues)
<input type="checkbox"/>	<input type="checkbox"/>	2-	Mercury
<input type="checkbox"/>	<input type="checkbox"/>	2-	Nickel
<input type="checkbox"/>	<input type="checkbox"/>	2-	Selenium
<input type="checkbox"/>	<input type="checkbox"/>	2-	Silver
<input type="checkbox"/>	<input type="checkbox"/>	2-	Thallium
<input type="checkbox"/>	<input type="checkbox"/>	2-	Vanadium
<input type="checkbox"/>	<input type="checkbox"/>	2-	Zinc
<input type="checkbox"/>	<input type="checkbox"/>	2-	Cyanide (total)
<input type="checkbox"/>	<input type="checkbox"/>	2-	Cyanide (Amenable)
<input type="checkbox"/>	<input type="checkbox"/>	2-	Fluoride
<input type="checkbox"/>	<input type="checkbox"/>	2-	Sulfide



Hazardous Waste Compliance Monitoring and Enforcement Log

1-27-97

FORM
A

HANDLER

ID Number: KSD007246846 LDF () TSF ☒ GEN ☒ KG () SQ () TRA ()
HWM () HWB () UOM () UOB () NOT A GEN ()

Laidlaw d.b.a.
Handler Name: Hydrocarbon Recyclers of Wichita AT N/A CL N/A
FT 1-21-97 RCRIS 1-23-97

Street: 2549 N. New York City: Wichita County: SG

EVALUATION New ☐ Followup: Date (on site) ☐ ☐ ☐ Date (of letter) 01 13 97 Delete ☐

Date 96 04 18 Agency S Type CSE Reason 01 Person TLH District SC

Areas of Evaluation (EV - Evaluated, NE - Not Evaluated, NA - Not Applicable)

Generator		Transporter		Treatment/Storage/Disposal Facility				Other	
GER <input type="checkbox"/>	GPT <input checked="" type="checkbox"/>	TGR <input type="checkbox"/>		DCH <input type="checkbox"/>	DGW <input type="checkbox"/>	DMC <input type="checkbox"/>	DPP <input type="checkbox"/>	BRR <input type="checkbox"/>	
GGR <input checked="" type="checkbox"/>	GRR <input type="checkbox"/>	TMR <input type="checkbox"/>		DCL <input type="checkbox"/>	DIN <input type="checkbox"/>	DMR <input type="checkbox"/>	DSI <input type="checkbox"/>	CAS <input type="checkbox"/>	
GLB <input checked="" type="checkbox"/>	GSC <input type="checkbox"/>	TOR <input type="checkbox"/>		DCP <input type="checkbox"/>	DLB <input type="checkbox"/>	DOR <input type="checkbox"/>	DTR <input type="checkbox"/>	CSS <input type="checkbox"/>	
GMR <input checked="" type="checkbox"/>	GSQ <input type="checkbox"/>	TRR <input type="checkbox"/>		DFR <input type="checkbox"/>	DLF <input type="checkbox"/>	DOT <input type="checkbox"/>	DTT <input type="checkbox"/>	FEA <input type="checkbox"/>	
GOR <input type="checkbox"/>		TWD <input type="checkbox"/>		DGS <input type="checkbox"/>	DLT <input type="checkbox"/>	DPB <input type="checkbox"/>	DWP <input type="checkbox"/>	ILD <input type="checkbox"/>	

Used Oil UOM ☐ UOB ☐ UTM ☐ SUM ☐ SUB ☐

COMMENTS

VIOLATION # 6 Date Determined 04 18 96
New ☐ Change ☒ Delete ☐ Comments ☐
Agency S Number 29 Area DMC Class 1 Priority ☐ Type SR
Regulation Citation: Permit III.C.
Description: 18 drums in poor condition Returned to Compliance
Scheduled: N.D.S. 07
Actual: ☐ ☐ ☐

VIOLATION # 9 Date Determined 04 18 96
New ☐ Change ☒ Delete ☐ Comments ☐
Agency S Number 32 Area DMC Class 1 Priority ☐ Type SR
Regulation Citation: KAR 28-31-4(g)
Description: 19 drums not labeled Returned to Compliance
Scheduled: 09 11 96
Actual: 09 10 96

VIOLATION # 10 Date Determined 04 18 96
New ☐ Change ☒ Delete ☐ Comments ☐
Agency S Number 33 Area DGS Class 2 Priority ☐ Type SR
Regulation Citation: Permit II.E.
Description: 3 daily inspections not documented. Returned to Compliance
Scheduled: 09 11 96
Actual: 09 10 96

VIOLATION # 11 Date Determined 04 18 96
New ☐ Change ☒ Delete ☐ Comments ☐
Agency S Number 34 Area DGS Class 2 Priority ☐ Type SR
Regulation Citation: Permit II.E.
Description: Remedial action not noted on log. Returned to Compliance
Scheduled: 09 11 96
Actual: 09 10 96

Facility Name: Hydrocarbon Recyclers of Wichita